

Vernal RMP Five-Year Evaluation Report [November 2014]

I. SUMMARY INFORMATION

- 1.1 **Plan Name and Type (MFP/RMP):** Vernal Field Office Resource Management Plan
- 1.2 **Record of Decision Date:** October 30, 2008
- 1.3 **Five Year Evaluation Number (I, II, III, IV):** I
- 1.4 **List all Completed Amendments by Name, include Amendment Purpose (Program Area) and Decision Date:**
- No plan amendments have been completed.
- 1.5 **List all Program-specific or integrated activity level plans (AMPs, HMPs, HAMPs, RAMPs, CRMPs, etc.) which have been completed under this plan and Decision Date from 2008-2013:**

Activity Level Plans for ACECs or SRMAs

- No program-specific or integrated activity level plans have been completed.
- An activity level plan for the Parriette Wetland ACEC is in process.
- An update for the 1994 Nine Mile Canyon Special Recreation and Cultural Management Area is in process. This plan spans across both the Vernal and Price field offices.

Allotment Management Plans (AMPs)

NEPA #	Project Name	Date Approved
DOI-BLM-UT-G010-2008-0293	Thunder Ranch Grazing Permit Renewal	07-07-2010
DOI-BLM-UT-G010-2008-0791	Grazing Permit Renewal for the Hoy Mountain Allotment	07-19-2010
DOI-BLM-UT-G010-2009-0218	Ten Year Grazing Permit Issuance: Allotments: Argyle Ridge, Lears Canyon & Water Canyon #1	06-25-2013
DOI-BLM-UT-G010-2009-0461	Ten Year Grazing Permit Renewal Currant Canyon Allotment	01-19-2010
DOI-BLM-UT-G010-2009-0530	Grazing Permit Renewal for Bohemian Bottoms and Stirrup Allotments	08-08-2009
DOI-BLM-UT-G010-2010-0048	Ten Year Grazing Permit Issuance: Oil Shale Allotment	07-26-2010
DOI-BLM-UT-G010-2010-0139	Ten Year Grazing Permit Issuance: Halfway Hill, Hells Hole, Powder Wash, and Snake John Allotments.	07-19-2012
DOI-BLM-UT-G010-2011-0079	Ten Year Grazing Permit Issuance: Red Mountain Allotment	07-19-2011
DOI-BLM-UT-G010-2011-0154	Grazing Permit Renewal for the Wetlands Allotment	07-19-2011
DOI-BLM-UT-G010-2011-0294	Ten Year Grazing Permit Issuance: Mail Draw Allotment	07-19-2011
DOI-BLM-UT-G010-2012-0058	Taylor Flat Grazing Authorization	04-02-2012
DOI-BLM-UT-G010-2013-0101	Red Creek Flat Grazing Authorization	04-13-2013

1.A. Introduction

This report presents the findings and recommendations for the Vernal Field Office Resource Management Plan (RMP) Five-Year Monitoring and Evaluation Report. The Vernal RMP states that:

BLM will use land use plan evaluations to determine if the decisions in the RMP, supported by the accompanying NEPA analysis, are still valid in light of new information and monitoring data. Evaluation of the RMP will generally be

conducted every five years, unless unexpected actions, new information, or significant changes in other plans, legislation, or litigation triggers an evaluation.¹

This evaluation constitutes the first evaluation and status summary. This evaluation was conducted with representatives from the Washington Office, Utah State Office, and Nevada State Office as well as from input and recommendations from the Vernal Field Office management and staff.

1.B. Purpose

Planning regulations require that RMPs establish intervals and standards for monitoring and evaluation of the plan (43 CFR 1610.4-9). The Vernal Record of Decision states that the plan would be reviewed on a minimum of five year intervals to determine whether it is still current and whether objectives are being met. The purpose of this evaluation is to fulfill both the special evaluation requirement and determine if the Vernal RMP is serving as an effective guide for multiple use management of the public lands, or if it requires amendment or revision.

The Vernal RMP states:

Evaluation is a process in which the plan and monitoring data are reviewed to see if management goals and objectives are being met and if management direction is sound. Land use plan evaluations determine if decisions are being implemented, whether mitigation measures are satisfactory, whether there are significant changes in the related plans of other entities, whether there is new data of significance to the plan, and if decisions should be changed through amendment or revision. Monitoring data gathered over time is examined and used to draw conclusions on whether management actions are meeting stated objectives, and if not, why. Conclusions are then used to make recommendations on whether to continue current management or to identify what changes need to be made in management practices to meet objectives.

BLM will use land use plan evaluations to determine if the decisions in the RMP, supported by the accompanying NEPA analysis, are still valid in light of new information and monitoring data. Evaluation of the RMP will generally be conducted every five years, unless unexpected actions, new information, or significant changes in other plans, legislation, or litigation triggers an evaluation.²

1.C. Approach

Direction for this evaluation is outlined in the BLM Land Use Planning Handbook H-1601-1. The handbook states:

Evaluation is the process of reviewing the land use plan and the periodic plan monitoring reports to determine whether the land use plan decisions and NEPA analysis are still valid and whether the plan is being implemented. Land use plans are evaluated to determine if:

- (1) decisions remain relevant to current issues,
- (2) decisions are effective in achieving (or making progress toward achieving) desired outcomes,
- (3) any decisions need to be revised,
- (4) any decisions need to be dropped from further consideration, and

¹ Vernal RMP ROD, page 63.

² Vernal RMP ROD, page 63.

(5) and areas require new decisions.

To evaluate the effectiveness, consistency and conformance of the RMP toward implementation of current BLM policies/plans/initiatives and related plans of others, the Washington Office developed a questionnaire to focus the evaluation. Interviews were held with the Vernal Field Office managers and resource specialists September 9-11, 2014. The questions and responses by field office specialists/management are attached,³ with results summarized within this report.

1.D. Background

The Vernal Resource Management Plan (RMP) was approved on October, 30, 2008. In the six years since plan approval, the only RMP amendments are the result of incorporating multi-state energy related Programmatic Environmental Impact Statements (e.g., Oil Shale / Tar Sands PEIS; Geothermal PEIS, Wind Energy PEIS, Solar Energy PEIS).

Even though the RMP has not been otherwise amended, the Vernal RMP does allow for plan maintenance to take place.

Land use plan decisions and supporting information can be maintained to reflect minor changes in data, but maintenance is limited to refining, documenting, and/or clarifying previously approved decisions. Some examples of maintenance actions include:

- Correcting minor data, typographical, mapping, or tabular data errors
- Refining baseline information as a result of new inventory data (e.g., changing the boundary of an archaeological district, refining the known habitat of special status species or big game crucial winter ranges, or adjusting the boundary of a fire management unit based on updated fire regime condition class inventory, fire occurrence, monitoring data, and/or demographic changes)
- Applying an existing oil and gas lease stipulation to a new area prior to the lease sale based on new inventory data (e.g., apply an existing protective stipulation for sage-grouse to a newly discovered sage-grouse lek).

The BLM expects that new information gathered from field inventories and assessments, research, other agency studies, and other sources will update baseline data and/or support new management techniques, best management practices, and scientific principles. Adaptive management strategies may be used when monitoring data is available as long as the goals and objectives of the plan are met. Where monitoring shows land use plan actions or best management practices are not effective, minor modifications or adjustments may occur without amendment or revision of the plan as long as assumptions and impacts disclosed in the analysis remain valid and broad-scale goals and objectives are not changed.

Plan maintenance will be documented in supporting records. Plan maintenance does not require formal public involvement, interagency coordination, or the NEPA analysis required for making new land use plan decisions.⁴

³ Appendix 1 – Questionnaire / Vernal Field Office Responses

⁴ Vernal RMP ROD, page 62.

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From the time that the Vernal RMP was approved, 25 RMP maintenance actions have occurred with one additional action still in process for 2014 (e.g., changes as a result of the Utah Recreational Land Exchange):

- 2009 – 14 maintenance actions
- 2010 – 1 maintenance action
- 2011 – 5 maintenance actions
- 2012 – 1 maintenance action
- 2013 – 1 maintenance actions
- 2014 – 3 maintenance actions

Total 2009-2014 = 25 maintenance actions

All maintenance action forms are posted on the Vernal BLM home page for public view and access.

1.E. Conclusion of the 2014 Plan Evaluation

The 2014 status review essentially that there was a strong tie between implementation and budget and that decisions were being implemented in concert with priorities established in the plan. Although the status review notes the plan was elapsed in some cases (e.g., Reasonably Foreseeable Development, Utility Corridors) and implementation had not kept pace with this timeframe, it must also be noted there is no direct correlation between plan life and pace of implementation. Plan decisions and their implementation, to include the development of subordinate activity and project plans, reflect complex relationships among resource concerns, the public, annual funding and agency priorities. Overall, guidance in the plan was considered adequate to meet the goals and objectives as stated in the plan.

The “deficiencies” identified in the 2014 assessment are not necessarily deficiencies related to plan decisions, rather, areas of resource concerns and issues identified which have only been recently emerging due to changing circumstances and new information. In many cases, the deficiencies are being addressed through on-going plan implementation and associated revision and updating processes. For example:

1. Although Native American concerns and consultation were identified as issues, there are no specific plan decisions which address this. Consultation is a process and is on-going when appropriate as a matter of policy, whether highlighted in a RMP or not.
2. One of the granted protest issues identified in the Vernal RMP is for the potential designation of two ACECs which were overlooked during the planning process. The BLM has reviewed its administrative record and found that comments submitted in February 2006 (during a comment period for gathering input on potential ACECs) did include recommendations for designating ACECs to protect Graham’s penstemon (*Penstemon grahamii*) and Uintah Basin Hookless Cactus habitat (*Sclerocactus glaucus [=brevispinus and wetlandicus]*). These recommendations were mistakenly overlooked. Because the BLM did not review or consider the recommendations in accordance with BLM 1613 Manual, the protest is granted and these recommended areas will be considered at the earliest opportunity as part of the next planning process conducted in the Field Office.⁵

⁵ Vernal RMP ROD, page 18.

3. The RMP does identify air quality standards; however the standards are out of date because they were based on a smaller number of wells that were currently in development or were projected to be developed in the Reasonable Foreseeable Development (RFD) scenario included in the RMP. Also, the management practices are currently evolving. The Resource Technical Advisory Group (RTAG), an interagency group made up of state, tribal, local and federal agencies, is developing revised standards and management practices, and the Vernal Field Office is using those new standards and practices as they are developed, but they are not reflected in the current RMP. The management practices are updated on a monthly basis. RTAG has also developed models and studies to inform the development of management practices. Lease sale notices always include language that allows BLM to update management practices. The modeling included in the RMP is also out of date, and currently lease sale Environmental Assessments (EA) do not include quantitative analysis of air quality impacts, though they do disclose average emissions from a single well. The Uintah Basin is already near or in exceedance of ambient air quality standards.
4. The Record of Decision (ROD) and Approved Resource Management Plan (RMP) (October 2008) directs the Bureau of Land Management (BLM) Vernal Field Office (VFO) to complete a Comprehensive Travel and Transportation Management Plan for all the BLM-managed public lands located in Daggett, Duchesne, and Uintah Counties, and a small portion of Grand County, Utah.⁶

The Vernal FO is in the process of developing a Comprehensive Travel and Transportation Management Plan. At present, the FO has been subdivided into five smaller Travel Management Areas (TMAs).
5. Sage Grouse conservation concerns are currently being addressed; the draft Utah Greater Sage-Grouse Land Use Plan (RMP) Amendment/EIS would amend 14 BLM (including the Vernal RMP) and six Forest Service land use plans.

II. RMP DIRECTION FOR NATIONAL / STATE POLICIES AND INITIATIVES

II.A. National Energy Policy

The goals and objectives of the Vernal RMP include objectives to “Meet local and national non-renewable and renewable energy and other public mineral needs” and improve “energy distribution opportunities.”⁷

The restrictions and stipulations in the RMP are adequate for the development of site-specific mitigation measures to ensure adequate protection of critical wildlife resources. No additional restrictions were identified and no restrictions were determined to be no longer needed or unnecessary.

The Reasonable Foreseeable Development (RFD) has been updated as a technical support document, and has been used in the analysis in any subsequent lease sale EA or EIS. This updated RFD appropriately identified the level of activity currently occurring and projected over the near term.⁸

⁶ Vernal RMP ROD, page 22.

⁷ Vernal RMP ROD, page 97.

⁸ Greater Uinta Basin Oil and Gas Cumulative Impacts Technical Support Document, March 2012.

The Vernal FO was not identified for renewable energy development based on the approved wind (December 2005), solar (October 2012), or geothermal (December 2008) Programmatic Environmental Impact Statements (PEIS). Even though the VFO planning area is not considered to have high potential wind or solar development, the Vernal RMP does state that:

The plan will recognize the opportunity for alternative energy development such as wind, solar, and geothermal. BMPs will be developed from PEISs such as ones completed or initiated for wind and solar energy.

Individual alternative energy proposals will be evaluated based on conformance with other program goals and objectives stated in the plan.⁹

There is one area identified for geothermal potential but there have been no proposals for development.

II.B. National Fire Plan

The Fire Management decisions in the Vernal RMP provided goals, objectives, standards, and guidelines that ensure compliance with applicable laws, rules, regulations and policies.

A National Environmental Policy Act (NEPA)-compliant Fire Management Plan (FMP) was completed for the Vernal Planning Area (VPA) in 1998. The FMP reflects the goals and objectives for vegetation management and fire's role in maintaining healthy ecosystems and is incorporated into the Vernal RMP. The FMP was updated in 2005 and was signed once the ROD has been signed for the VFO. The Approved RMP allows the VFO to support the goals and objectives of the FMP.

Fire management categories (FMCs) have been edge-matched with surrounding districts and adjoining states. Where management prescriptions within FMCs do not match adjoining jurisdictions, rationale is provided for the difference in management strategies or objectives.

III.C. Priority Corridors

The Vernal RMP provides for orderly corridor planning. The RMP is consistent with existing right-of-way (ROW) corridors, including the Western Utility Group (WUG) updates to the Western Regional Corridor Study (Figure 6a), and will designate additional corridors subject to physical barriers, and sensitive resource values. However, some utility corridor decisions are in conflict with decisions affecting other resources in the Vernal RMP. For example, there are conflicts with ROW corridors overlapping with eligible Wild and Scenic River (WSR) segments (Green River segment is eligible for Recreation) and ACECs.

Any major linear ROWs that are proposed outside of the preferred, designated corridors may require a plan amendment.¹⁰

Overall, most current designated corridors are adequate in width to accommodate existing and potential uses at the current rate of development. Increased future applications may require further corridor planning. Corridors do not contain specific management objectives for wildlife and vegetation resources. All vegetation and wildlife management objectives are applicable across the landscape. Future corridor planning may provide more specific management objectives within a designated corridor as the need arises.

III.D. Threatened, Endangered, and Sensitive Species (TES)

⁹ Vernal RMP ROD management decisions MIN-3 and MIN-4.

¹⁰ Vernal RMP ROD management decisions LAR-41 and LAR-42.

Informal Section 7 consultation, as directed by the Endangered Species Act, subsequent regulations, and BLM policy, was conducted with the U.S. Fish and Wildlife Service (USFWS) throughout the development of the RMP. The BLM submitted a Biological Assessment (BA) and requested initiation of formal consultation on August 22, 2008. The USFWS responded with a Biological Opinion (BO) on October 24, 2008, completing the formal Section 7 consultation process. The BO concurred with the determinations made in the BA regarding potential effects on listed threatened and endangered species located within the planning area. The BO and cover letter is in Appendix N of the Approved RMP. The BA and the BO contain committed conservation measures that have been incorporated into the ROD and will be a part of the implementation of the Approved RMP. These are committed measures that will be included as part of the proposed action of any subsequent site specific activities authorized by the RMP. Should any changes be made in any of the conservation measures identified in the BA and BO, Section 7 consultation with USFWS will be re-initiated. The USFWS further determined that implementation of the RMP, including committed mitigation measures, would not jeopardize the existence of any of the listed species.¹¹

The BLM, in coordination with the USFWS developed the majority of these committed conservation measures as part of a programmatic Section 7 consultation that was completed in 2007. Some modifications and additional measures were developed during the consultation process specific to the Vernal RMP. All site specific level actions potentially impacting listed species or their critical habitat will implement these measures. Incorporating these measures will ensure that the BLM is in compliance with the Endangered Species Act and will meet necessary management and recovery goals. If BLM determines that any deviations, modifications, or waiver of these conservation measures may be necessary on a given project, re-initiation of Section 7 consultation with USFWS will be necessary. BLM notes that the Biological Opinion (Appendix N of the Approved RMP), provides a number of recommended conservation measures that are beyond the scope of this Approved RMP, but may be considered in tiered consultation with this programmatic opinion when project-specific analysis is conducted in the future. These recommended conservation measures are optional measures, additional to the committed mitigation contained in the Approved RMP, that BLM will consider at the appropriate time and as deemed necessary to manage and recover listed and candidate plant and animal species occurring within the planning area.

Non-listed sensitive species and the habitats upon which they depend are managed in such a manner as to preclude the need to list them as either threatened or endangered under the Endangered Species Act. The guidance for this management is put forth in the BLM 6840 Manual.

The timing limitation stipulations in the Approved RMP are applied to crucial big game wildlife and raptor habitats identified by the BLM and the Utah Division of Wildlife Resources. The areas with timing limitations are open to oil and gas leasing and other surface disturbing activities but will be closed during identified timeframes that are important to the health of the species such as winter range and birthing periods, unless a waiver, exception or modification to the stipulation applies.

Finally, the Vernal RMP provides some direction to protect and conserve sage grouse (a sensitive species that has been petitioned for listing as a T&E species). The RMP incorporates the Western Association of Fish and Wildlife Agencies (WAFWA) guidelines. The Vernal RMP states:

¹¹ Vernal RMP ROD, page 49.

Restore or rehabilitate up to 200,000 acres of sagebrush-steppe habitat over the life of the plan. Such vegetation treatment plans will consider the Western Association of Fish and Wildlife Agencies (WAFWA) Guidelines for Management of Sage-grouse Populations and Habitats and State and Local Conservation Plans.¹²

Although the Vernal RMP did not specifically address sensitive species, management decisions and management of wildlife habitat to achieve RMP objectives is interpreted and applied to meet the needs of sensitive species. One of the stated goals states that:

Manage non-listed sensitive species and the habitats upon which they depend in such a manner as to preclude the need to list them as either threatened or endangered under the Endangered Species Act. The guidance for this management is put forth in the BLM 6840 Manual.¹³

III. RMP IMPLEMENTATION

Implementation is based on the priorities for each resource established in the ROD, as balanced with BLM, Congressional, and Administration priorities and initiatives. Implementation priorities are not date specific. The pace of implementation appears to be adequate given the complex set of issues that exist relative to implementation of multiple use objectives. Management actions such as developed through the multiple use decision process, and now the 4180 handbook assessment process, are achieving management goals and objectives outlined in the RMP and are one of the primary vehicles in the RMP to effect such adaptive change and progress to meeting goals and objectives.

IV. CONSISTENCY WITH RELATED PLANS OF OTHERS

Consistency of the Vernal RMP with other local, State, Tribal and federal plans and policies was considered as a factor in selection of the Approved RMP. The Approved RMP is consistent with plans and policies of the Department of the Interior and Bureau of Land Management, other federal agencies, state government, and local governments to the extent that the guidance and local plans are also consistent with the purposes, policies, and programs of federal law and regulation applicable to public lands. Chapter 5 of the Proposed RMP/Final EIS provides a full discussion of consistency with all involved entities.

IV.A Governor's Consistency

The Governor's Office did not identify any inconsistencies concerning state or local plans, policies, and programs following the 60-day Governor's Consistency Review of the Proposed RMP/Final EIS (initiated August 22, 2008, in accordance with planning regulations at 43 CFR Part 1610.3-2(e), and concluded on October 24, 2008).

VI. IS A PLAN AMENDMENT OR REVISION NECESSARY?

A close-out for this plan evaluation was conducted at the Vernal Field Office with representatives from the Washington Office, Utah State Office, and Nevada State Office as well as from input and recommendations from the Vernal Field Office management and staff on September 12, 2014. The results of the close out are summarized below.

Based on this and past RMP evaluations, is there sufficient cause to warrant amendment or revision of the land use plan to accommodate implementation of National and State

¹² Vernal RMP ROD, page 137. See also Vernal RMP ROD management decisions SSS-25, SSS-26, and SSS-27 on page 132.

¹³ Vernal RMP ROD, page 128.

priorities and initiatives? If so, identify the program area(s) which warrant plan modification and the initiative/priorities affected.

It has been proposed that a potential Master Leasing Plan (MLP) be developed for two areas located along the Utah/Colorado border in Uintah County. It is possible that the two proposed ACECs for Graham's penstemon (*Penstemon grahamii*) and Uintah Basin Hookless Cactus (*Sclerocactus glaucus* [= *brevispinus* and *wetlandicus*]) could be considered as part of the MLP as this would be the next available planning process.

No other major program areas were highlighted based on this review to warrant recommendation for a plan revision or major plan amendment for multiple issues. It is acknowledged that new decisions for OHV will be addressed once the Comprehensive Travel and Transportation Plan is completed. Until the TMP is complete, OHV travel will be limited to designated routes or closed except for managed areas as described in Vernal RMP management decision TRC-13. Discretionary and non-discretionary closures and limited designations exist for WSAs and special areas. The Vernal RMP contains appropriate stipulations and restrictions for activities to protect critical resources and serve to provide adequate protection and guidance in the absence of new OHV designations. At such time as future issues arise or a major plan revision may become necessary, OHV classifications would be revisited and developed.

Based on new information or circumstances, is there sufficient cause to warrant completing supplemental NEPA analyses or RFDs to keep the RMP current? If so, identify the specific program areas which require focused supplemental analysis or RFDs.

At this time, there has been no identification of updated RFDs required to keep the plan current based on the current rate of industry interest or development for energy and fluid minerals activities. The Vernal RMP planning area is a high interest area for these types of resources and the RMP. Because of the rapid and evolving nature of the oil and gas industry, there is the potential that new RFDs may be needed to provide adequate direction and analysis to accommodate these activities.

There is the potential that new requirements may be needed for air quality.

It is the conclusion of this review that the Vernal RMP continues to provide appropriate management direction for public lands in light of the new national and regional initiatives. The Vernal RMP, through the use of plan maintenance and incorporation of Programmatic EIS plan previous amendments (e.g., oil shale/tar sands PEIS, pending sage grouse PEIS), continues to provide updated and appropriate management for these resource issues. The Vernal RMP has been maintained and amended in a timely manner to respond to and address major resource issues of concern as they have arisen since the plan was developed. In this regard, the Vernal RMP provides a positive example of proper Land Use Plan management and continues to be a useful tool for public land management.

No further modification to this plan is recommended based on this evaluation other than the two potential ACECs mentioned above. The next plan evaluation and review is scheduled for 2020.

Attachment 1

Questionnaire/Vernal Field Office Responses

2014 Vernal RMP Evaluation

I. APPROPRIATE MANAGEMENT DIRECTION

The focus of the following questions are designed to help determine if the Vernal Resource Management Plan (RMP) provides appropriate management direction to implement recent State and National policy, direction and/or initiatives, including National Energy Policy, Priority Corridors, and Threatened, Endangered and Sensitive Species.

A. National Energy Policy

1. *Are restrictions and stipulations affecting renewable energy development and fluid mineral (O&G, Geothermal) appropriate to protect critical resources and special areas?*

The leasing stipulations developed as part of the RMP are included in Appendix K (Surface Stipulations Applicable to All Surface-Disturbing Activities). There are additional leasing stipulations that have been developed subsequently that provide additional protections and are included in current leases. In addition, Appendix L (Utah's Threatened and Endangered Lease Notices for Oil and Gas and BLM-committed Conservation Measures) adequately protects critical resources, special areas, and species.

Restrictions and stipulations stated in the RMP are adequate for the development of site specific mitigation measures to ensure adequate protection of critical wildlife resources.

2. *Are there additional restrictions that are needed?*

No. However, surface stipulations will be appended, where applicable, to land use authorizations, permits, and leases issued on BLM administered lands.

3. *Are there restrictions that should be eliminated or modified because they no longer are needed/appropriate, or there are other protective mechanisms in place which supersede their use, or there are industry technological changes which make the restriction unnecessary?*

The RMP does identify air quality standards; however the standards are out of date because they were based on a smaller number of wells that were currently in development or were projected to be developed in the Reasonable Foreseeable Development (RFD) scenario included in the RMP. Also, the management practices are currently evolving. The modeling included in the RMP is also out of date, and currently lease sale Environmental Assessments (EA) do not include quantitative analysis of air quality impacts, though they do disclose average emissions from a single well. The Uintah Basin is already near or in exceedance of ambient air quality standards.

4. *Are Reasonable Foreseeable Development scenarios for implementing energy-related exploration and development in the planning area appropriate for the level of activity occurring now and projected in the near term (3-5 years)?*

Yes. The Reasonable Foreseeable Development (RFD) has been updated as a technical support document, and has been used in the analysis in any subsequent lease sale EA or EIS. This updated RFD appropriately identified the level of activity currently occurring and projected over the near term.

5. *Does the RMP provide direction and flexibility to accommodate wind energy development? Are there constraints in the RMP which would affect or delay issuing Rights-of-Way for wind energy development?*

Yes. Major ROW projects such as wind farm ROWs may be permitted on a case-by-case basis if the project is consistent with the goals and objectives or other land management prescriptions. If it is not in compliance with the land management prescriptions, then it will require a plan amendment.

B. National Fire Plan

1. *How well do the Fire Management Categories match up with FMCs of adjoining BLM districts in Nevada, Utah, and Idaho?*

Fire management categories (FMCs) have been edge-matched with surrounding districts and adjoining states. The Vernal Fire Management Plan (FMP) has been revised to comply with the Interagency Template for Fire Management Plans and identifies Fire Management Units (FMUs) that describe the mix of management activities that can be used to meet the desired future conditions and land use objectives.

2. *In cases where FMCs do not match, is there sufficient rationale to validate the FMC boundaries for the planning area?*

Where management prescriptions within FMCs do not match adjoining jurisdictions, rationale is provided for the difference in management strategies or objectives.

3. *Does the RMP present any constraints or issues relative to complying with the Wildland Fire Policy?*

No. All fire-management planning activities will comply with the National Fire Plan, including the streamlined USFWS Section 7 Consultation procedures.¹⁴

4. *Does the RMP present any constraints to approving biomass utilization projects for energy production, commercial and/or non-commercial uses (e.g. public woodcutting, commercial, co-generation energy production, etc.).*

No. Two of the stated Goals and Objectives discussed in the Fire and Fuels Management section of the Vernal RMP state:

- Restore productivity and biodiversity in forest, woodland, and riparian areas. Allow for the harvest of pinyon/juniper for fuel wood, **biomass**, posts, pinyon nuts, Christmas and ornamental live trees, and special forest products. Manage pinyon/juniper to control encroachment and to improve wildlife habitat, woodland health, and watershed conditions.
- Encourage utilization of woodland products, **including biomass**, from lands that will be converted to other resource uses and salvage of woodland products where compatible with other resource management objectives.

C. Priority Corridors

1. *Does the RMP provide for orderly corridor planning to meet current National needs and technological trends? If No, explain.*

Yes. See Vernal RMP management decisions LAR-40 through LAR-45.

¹⁴ See Vernal RMP ROD management decision FIRE-7.

3. Does the RMP require further NEPA or planning analysis to accommodate the proposed Western Utility Group Level 1 Priority Corridors? If Yes, explain.

No. The Vernal RMP is consistent with existing right-of-way (ROW) corridors, including the Western Utility Group (WUG) updates to the Western Regional Corridor Study (Figure 6a), and will designate additional corridors subject to physical barriers, and sensitive resource values.¹⁵

4. Does the RMP adequately consider ROW corridors, ROW use areas, and other ROW issues? If No, explain.

Yes. See Vernal RMP ROD, pages 86-93. ROW issues addressed include but not limited to:

- Disposals
- Easements
- Exchanges/Acquisitions
- Fencing Requirements for Paved Highways
- Land Tenure Adjustments (LTAs)
- Non-WSA Lands with Wilderness Characteristics (aka BLM natural areas)
- Other Methods of Acquisition
- Recreation and Public Purpose Act (R&PP)
- Rights-of-Way (ROWs)/Easements
- Sales
- Transportation and Utility Corridors
- Trespass Resolution
- Withdrawals

In addition, Appendix S identifies public lands considered for disposal. These area are depicted on Figure 6a.

5. Does the scope of designated corridors within the planning area accommodate existing, compatible, proposed and/or new uses? If No, explain.

No. The Vernal RMP provides for orderly corridor planning. However, some utility corridor decisions are in conflict with decisions affecting other resources in the Vernal RMP. For example, there are conflicts with ROW corridors overlapping with WSR segments and ACECs.

6. Do designated corridors have appropriate width given potential and existing uses or energy demand? If No, explain.

Yes. However, major linear ROWs that are proposed outside of the preferred, designated corridors may require a plan amendment.¹⁶

The Vernal RMP provides for orderly corridor planning. The RMP is consistent with existing right-of-way (ROW) corridors, including the Western Utility Group (WUG) updates to the Western Regional Corridor Study (Figure 6a), and will designate additional corridors subject to physical barriers, and sensitive resource values. However, some utility corridor decisions are in conflict with decisions affecting other resources in the Vernal RMP. For example, there are conflicts with ROW corridors overlapping with WSR segments and ACECs.

7. Are there resource management objectives for TES for designated corridors?

Objectives are not specific to the corridors. The BLM is required to consult with the Fish and Wildlife Service in accordance with Section 7 of the Endangered Species Act whenever it is

¹⁵ See Vernal RMP ROD management decision LAR-40.

¹⁶ See Vernal RMP ROD management decision LAR-42.

determined that Federally authorized actions may affect listed threatened or endangered species.

8. *Are there vegetation management objectives identified specifically within designated corridors that provide for sustainability of habitat while accommodating long-term maintenance of rights of way within the corridor?*

Objectives are not specific to the corridors. Vegetation management is typically addressed on a case-by-case basis within the NEPA document for utility ROWs. Vegetation management objectives within the ROW corridors are the same as those outside the corridor.

D. Threatened, Endangered and Sensitive Species (TES)

1. *Does the RMP provide adequate direction across all program areas for the conservation of Sage Grouse in VFO?*

Sage grouse management actions in the RMP were identified as inadequate. Sage Grouse conservation concerns are currently being addressed through the Utah sage-grouse planning effort. Until local conservation plans are completed, the BLM has established interim guidelines for the management of sage grouse habitats relative to permitted public land use activities in Utah, including standard operating procedures for fire suppression and fire rehabilitation activities.

2. *Are the WAFWA guidelines incorporated into the RMP?*

The Vernal RMP provides some direction to protect and conserve sage grouse (a sensitive species that has been petitioned for listing as a T&E species). The RMP incorporates the Western Association of Fish and Wildlife Agencies (WAFWA) guidelines. The Vernal RMP states:

Restore or rehabilitate up to 200,000 acres of sagebrush-steppe habitat over the life of the plan. Such vegetation treatment plans will consider the Western Association of Fish and Wildlife Agencies (WAFWA) Guidelines for Management of Sage-grouse Populations and Habitats and State and Local Conservation Plans.

3. *Does the RMP provide adequate direction to protect Migratory Birds?*

Migratory birds are protected in accordance with the Migratory Bird Treaty Act as well as Executive Order 13186 (Responsibilities of Federal Agencies To Protect Migratory Birds), which incorporates conservation measures for the protection of migratory birds, as outlined in the Utah Partners-In- Flight Avian Conservation Strategy and other scientific information, into all surface-disturbing activities.

In addition, the following wildlife management decisions describe how migratory birds are protected:

- | | |
|-------|---|
| WL-6 | In accordance with Executive Order 13186, incorporate conservation measures for the protection of migratory birds, as outlined in the Utah Partners-In-Flight Avian Conservation Strategy and other scientific information, into all surface-disturbing activities. See response above. |
| WL-13 | Develop antelope and upland game guzzlers on a case-by-case basis considering the effects to migratory birds, wildlife, and livestock. |

- WL-32 For neotropical migratory birds, provide habitat for the cavity-nesting non-game wildlife species and other species that utilize standing snags during a portion of their life cycles.
- WL-33 In cooperation with permittees, manage grazing to allow regeneration of riparian tree species and to protect natural water sources for the habitat of neotropical migratory birds.
- WL-34 Prevent the spread of non-native plants, especially cheatgrass, salt cedar, and Russian olive to maintain and enhance the habitat of neotropical migratory birds.
- WL-35 Strive for a dense understory with a reduction in salt cedar and improvement of cottonwood regeneration to maintain and enhance the habitat of neotropical migratory birds.

4. *Has the RMP undergone Section 7 consultation for all listed species within the planning area?*

Informal Section 7 consultation, as directed by the Endangered Species Act, subsequent regulations, and BLM policy, was conducted with the U.S. Fish and Wildlife Service (USFWS) throughout the development of the RMP. The BLM submitted a Biological Assessment (BA) and requested initiation of formal consultation on August 22, 2008. The USFWS responded with a Biological Opinion (BO) on October 24, 2008, completing the formal Section 7 consultation process. The BO concurred with the determinations made in the BA regarding potential effects on listed threatened and endangered species located within the planning area. The BO cover letter is in Appendix N of the Approved RMP. The BA and the BO contain committed conservation measures that have been incorporated into the ROD and will be a part of the implementation of the Approved RMP. These are committed measures that will be included as part of the proposed action of any subsequent site specific activities authorized by the RMP. Should any changes be made in any of the conservation measures identified in the BA and BO, Section 7 consultation with USFWS will be re-initiated. The USFWS further determined that implementation of the RMP, including committed mitigation measures, would not jeopardize the existence of any of the listed species.

The BLM, in coordination with the USFWS developed the majority of these committed conservation measures as part of a programmatic Section 7 consultation that was completed in 2007. Some modifications and additional measures were developed during the consultation process specific to the Vernal RMP. All site specific level actions potentially impacting listed species or their critical habitat will implement these measures. Incorporating these measures will ensure that the BLM is in compliance with the Endangered Species Act and will meet necessary management and recovery goals. If BLM determines that any deviations, modifications, or waiver of these conservation measures may be necessary on a given project, re-initiation of Section 7 consultation with USFWS will be necessary. BLM notes that the Biological Opinion (Appendix N, Approved RMP), provides a number of recommended conservation measures that are beyond the scope of this Approved RMP, but may be considered in tiered consultation with this programmatic opinion when project-specific analysis is conducted in the future. These recommended conservation measures are optional measures, additional to the committed mitigation contained in the Approved RMP, that BLM will consider at the appropriate time and as deemed necessary to manage and recover listed and candidate plant and animal species occurring within the planning area.

5. *Were sensitive species included in the RMP and were they included in the Biological Assessment?*

The Vernal RMP did not specifically address sensitive species. However, the management decisions and management of wildlife habitat to achieve the objectives as outlined above is interpreted to meet the needs of sensitive species.

Sensitive species were not included in the Biological Assessment. In accordance with Section 7 of the ESA, BLM is legally required to consult with the Fish and Wildlife Service whenever it determines that Federally listed endangered, threatened, or proposed species may be affected by Federally authorized or funded actions. There is no legal requirement to consult with Fish and Wildlife Service for sensitive species.

Non-listed sensitive species and the habitats upon which they depend are managed in such a manner as to preclude the need to list them as either threatened or endangered under the Endangered Species Act. The guidance for this management is put forth in the BLM 6840 Manual.

As per BLM Manual 6840.06(F), actions authorized by the BLM shall further the conservation of federally listed and other special status species (i.e. candidate, BLM and State listed sensitive species) and shall not contribute to the need to list any special status species under provisions of the ESA, or designate additional sensitive species under provisions of this policy.

II. RMP IMPLEMENTATION

1. *Does the RMP have an implementation schedule?*

Implementation priorities are outlined for each resource issue in the Record of Decision. Implementation is based on priorities established in the ROD, and is not necessarily date specific.

Decisions in this plan will be implemented over a period of years depending on budget and staff availability. After issuing the ROD/Approved Plan, BLM will prepare an Implementation Plan that establishes tentative timeframes for completion of “one-time” actions identified in the Approved Plan. Most of these actions require additional analysis and site specific activity planning. This schedule will not include the decisions which are effective immediately upon approval of the plan (usually allocations), or the actions which describe the ongoing management that will be incorporated and applied as site-specific proposals are analyzed on an ongoing basis. This schedule will assist BLM managers and staff in preparing budget requests and in scheduling work. However, the proposed schedule must be considered tentative and will be affected by future funding, changing program priorities, non-discretionary workloads, and cooperation by partners and external publics. Periodic review of the plan will provide consistent tracking of accomplishments and provide information that can be used to develop annual budget requests to continue implementation.¹⁷

2. *Is the implementation schedule current?*

There is no direct correlation between plan life and pace of implementation. The pace of implementation appears to be adequate given the complex set of issues that exist surrounding implementation of multiple sets of objectives (i.e. grazing, wildlife habitat, riparian habitat, and wild horses).

3. *Is the rate and degree to which plan implementation is being completed meeting the goals and objectives of the RMP?*

¹⁷ Vernal RMP ROD, page 62.

See above.

4. *Are management actions (decisions implemented) achieving management goals and objectives?*

Activity level plans and projects are developed consistent with the objectives outlined in the RMP. Monitoring and evaluation schedules are developed as part of activity plan development. The allotment evaluation process in many cases (when individual allotments or groups of allotments are being evaluated to determine progress in attainment of objectives) is designed to evaluate progress in attainment of objectives. In addition, a plan conformance and NEPA adequacy review is conducted for all improvement projects being implemented as part of the activity plan.

III. CONSISTENCY WITH RELATED PLANS OF OTHERS

1. *Are there major changes in the related plans of other agencies (including tribal, state and county) since the plan was approved which are resulting in RMP direction to be inconsistent with the direction contained in those plans?*

The VFO is unaware of any such plans that render our RMP direction inconsistent. (The consistency of proposed actions is reviewed as part of the NEPA process.)

2. *Are the Land Health Standards consistent with the decisions contained in the Vernal RMP for the RAC area(s) to which they apply?*

The Vernal RMP incorporates the *BLM Utah Standards for Rangeland Health and Guidelines for Grazing Management* (see Appendix F) developed in conjunction with the Utah Resource Advisory Council (RAC) as base standards for assessing land health. All decisions under any of the alternatives would comply with federal laws, rules, regulations, and policies.

3. *Has the RAC developed additional Land Health Standards for activities or uses other than grazing?*

No. See previous answer.

4. *Are Land Health Standards specifically referenced in subsequent activity, implementation, or project plan decision records, findings of no significant impact, records of decision and use authorizations?*

Land Health Standards are specifically evaluated and referenced in the allotment evaluation process and subsequent multiple use decision. Land Health Standards are also referenced in grazing use authorizations and permits.

The BLM's policy regarding adjustments to the levels of livestock use authorized is to monitor and inventory range conditions under existing stocking levels and make adjustments to livestock use as indicated by this data to help assure that standards for rangeland health and resource objectives are met. Regulations at 43 CFR 4130.3-1 require that the terms and conditions under which livestock are authorized "ensure conformance with the provisions of subpart 4180" (Standards for Rangeland Health) and further that "authorized livestock grazing use shall not exceed the livestock carrying capacity of the allotment

According to BLM policy, decisions regarding authorized livestock use levels and the terms and conditions under which they are managed are implementation decisions (Land Use Planning Handbook H-1601-1, Appendix C, p. 15). The BLM assesses rangeland health, conducts monitoring and inventories, and evaluates this data on a periodic basis, normally on an allotment and/or watershed basis. After NEPA analysis, necessary changes to livestock management and implementation of *BLM Utah Standards for Rangeland Health and Guidelines for Grazing Management* are implemented through a proposed decision in accordance with 43

CFR 4160.1. These decisions determine the exact levels of use by livestock in conformance with the RMP and to meet resource objectives and maintain or enhance land health.

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Program *Resource likely needing addressed in proposed MLP	Question	Response(s)
Air Quality*	Does the RMP identify air quality standards and provide examples of prescriptive management practices to achieve them?	Yes the RMP does identify air quality standards (See Vernal RMP ROD, AG-4 and AQ-9, p. 70-71); however the standards are out of date because they were based on a smaller number of wells that were currently in development or were projected to be developed in the Reasonably Foreseeable Development (RFD) scenario included in the RMP. Also, the management practices are currently evolving. The Resource Technical Advisory Group (RTAG), an interagency group made up of state, tribal, local and federal agencies, is developing revised standards and management practices, and the Vernal Field Office is using those new standards and practices as they are developed, but they are not reflected in the current RMP. The management practices are updated on a monthly basis. RTAG has also developed models and studies to inform the development of management practices. Lease sale notices always include language that allows BLM to update management practices. The modeling included in the RMP is also out of date, and currently lease sale Environmental Assessments (EA) do not include quantitative analysis of air quality impacts, though they do disclose average emissions from a single well. The Uintah Basin is already near or in exceedance of ambient air quality standards.
	Does the RMP recognize the State of Utah's authority to regulate air quality impacts and establish emission standards?	The RMP does recognize the State of Utah's authority to regulate air quality impacts and to establish emissions standards (See Vernal RMP ROD, AQ-9 p. 71), but it does not recognize that EPA has authority over the two thirds of the field office that is in Indian Country to regulate air quality impacts and establish emissions standards. There is a similar issue with water quality.
	Does the RMP address impairment of visibility in federal and state Class I areas, including those which may be affected in adjacent states?	The RMP does not discuss Class I areas. There are no Class I areas in the planning area. The RMP did some near-field modeling, but did not do ozone modeling. The far field modeling is out of date, so it is difficult to say definitively whether or not there are impacts to Class I areas outside of the planning boundary from activities occurring on public lands within the planning area.
	Does RMP identify existing non-attainment areas, state and tribal implementation plans (SIPs, TIPS), and	There are currently no State or Tribal Implementation Plans, but BLM is expecting a Federal Implementation Plan to be developed shortly, and the Tribes are deferring to EPA in the development of that plan.

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Program *Resource likely needing addressed in proposed MLP	Question	Response(s)
	measures/actions to meet conformity with SIPs/TIPs?	
	Was air quality modeling done for the RMP? If so, was the modeling qualitative or quantitative? Briefly describe the model used.	The ISCST3 model was used for all near-field modeling. (Vernal PRMP/FEIS, p. 4-14) The CALPUFF model was used for the far-field modeling. (Vernal PRMP/FEIS, p. 4-19) The operating parameters used for each source were the same for both models, and both models are quantitative. The Oil and Gas RFD conducted for the RMP estimated that just over 7,000 wells would be drilled in the planning area during the life of the RMP. (Vernal PRMP/FEIS, p. 4-137) Now in its most recent analysis for the planning area BLM identifies over 28,000 projected wells (projections are made over a 15-20 year window). (Greater Uinta Basin Cumulative Impacts Technical Support Document, 2012, p. 10) This change in the number of wells projected means that the modeling done for the RMP is now out of date as its inputs for air quality source impacts are too low. However the current RFD may now be too high. It is a moving target based on the best available data. The updated RFD is used in any new EISs in the planning area. It is maintained as a technical support document and updated on a regular basis, and serves as the basis for cumulative analysis in any relevant NEPA documents. Also, in 2010 BLM did another air quality model, which included ozone. And a couple of the oil and gas lease sale EISs included further air quality modeling. RTAG just this year has completed a further model, which the Vernal Field Office can now use to run projections through.
	Based upon the information derived from modeling and/or monitoring, are the air quality standards being met? If not, what management actions or mitigation measures are prescribed?	The Vernal RMP says that with regard to air quality the planning area is “located in a region designated as unclassifiable for PM10 and unclassifiable/attainment for all other airborne pollutants [See 40 CFR Part 81] (L. Svoboda, EPA Region VIII, 2005)” (Vernal PRMP/FEIS, p. 3-3). Monitored exceedances of the ozone NAAQS have occurred frequently during winter inversion events in the Uinta Basin. While this does not occur every year, it is occurring often enough and to a sufficient degree that the Uinta Basin is likely to be designated a nonattainment area in the near future. BLM authorized activities (primarily oil and gas) are contributing to this. Also, the models used in the RMP couldn’t capture winter ozone issues: there are often ozone inversions in the winter in the planning area, especially when there is snow. Winter ozone inversions are not discussed or reflected in the decisions of the RMP. However RTAG is developing more accurate models to capture winter ozone issues in the planning area.

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		RTAG's models are designed to run mitigation measures through to see how effective they are. This process has been used to develop new Best Management Practices (BMPs), which are then posted on a public website and then BLM includes them in new leases. Also, anytime an APD is signed the latest BMPs and standard stipulations are included.
	Are there any other existing issues or any new/emerging issues that are not adequately addressed in the RMP?	There is now more particulate matter (PM) in the atmosphere or at least BLM has collected more data showing higher levels of PM than was disclosed in the RMP, and there may eventually be exceedances of the PM standards in the planning area. Also Air Quality Related Values (AQRV) are showing impacts, but AQRVs were not specifically addressed in the RMP although the air quality modeling that BLM included as a technical support document to the RMP did address AQRVs. (Vernal PRMP/FEIS, p. 4-19) In general when something is not addressed in the plan, BLM tiers to the new best information; for example EPA doesn't have any smoke rules for prescribed fires, so the Vernal office has agreed to follow Utah Division of Air Quality standards.
Climate Change*	If approved after January 2009, does the RMP recognize BLM Air Quality Manual and assess Climate change as required by Secretarial Order 3226-1?	RMP approved October 2008.
	Does the RMP analysis address greenhouse gas (GHG) emissions for affected resource programs such as fluid mineral production or other activities with GHG generating potential?	The Vernal RMP does not address GHG emissions. Projects in Vernal planning area now quantify potential GHG emissions.
	Does the RMP analysis address climate change	No, the Vernal RMP does not discuss that specific issue, but is addressed on a site specific basis during project implementation as part of a qualitative analysis.

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	effects on natural resources? If no, please explain.	
	Has the planning area been inventoried for terrestrial or subsurface carbon sequestration potential?	No, not in the Vernal planning area.
	Are there areas of terrestrial or subsurface carbon sequestration potential in the planning area as evidenced by applications to explore or develop?	No.
	Are there any other existing issues or any new/emerging issues that are not adequately addressed in the RMP?	The Vernal Field Office has had members of the public asking about climate change as it relates to cutting vegetation. With regard to oil and gas development, the operators within the field office have not done much flaring. There is no venting of natural gas. There has been some flaring during drilling, and on tribal lands. The BLM is not specifically authorizing any flaring within the Vernal Field Office, though leases do say that operators can flare.
Cultural, Paleontological, & Natural History Resources – Kathie Davies	Does the RMP address special cultural and paleontological resource issues, including traditional cultural properties and NRHP-eligible or listed districts or sites that may affect the location, timing, or method of development or use of other resources	The RMP identifies the laws that protect cultural or paleontological sites, but does not include specific special management for sites identified as NHRP eligible or listed. There are over 18,000 NRHP eligible sites in the planning area, and the RMP identified 6 NRHP listed sites and 12 more proposed sites. (Vernal PRMP/FEIS, p. 3-19 and Appendix D) BLM has received a number of nominations since the RMP was released, but has never received notice that they were listed. The AMS identifies the NRHP listed sites. However, the RMP specifically identifies the Browns Park and Nine Mile Canyon ACECs as areas with cultural resources relevant and important values, and provided them with special management attention “required to protect and prevent irreparable damage to important historic, cultural, or scenic values,” which includes

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	in the planning area?	<p>limitations on the location, timing, and method of development to protect the resources in those areas. (Vernal RMP ROD, p. 119-121) In addition, the following decisions address the protection of cultural resources in the planning area in a variety of contexts: LAR-13, LAR-20, LAR-40, SMRA-3, SMRA-5, TRC-4, and WDF-1. (Vernal RMP ROD, p. 88, 89, 91, 110, 133, 148) No Traditional Cultural Properties (TCPs) were identified during the development of the Vernal RMP, however subsequent to the release of the RMP the Ute Tribe has identified one potential TCP site they would like to be identified.</p> <p>The Paleontological Resources Preservation Act (PRPA), which was part of the Omnibus Public Lands Management Act of 2009, was not addressed in the Vernal RMP. The regulations to support the PRPA have also not been developed. The law says in part that “The Secretary shall manage and protect paleontological resources on Federal land using scientific principles and expertise. The Secretary shall develop appropriate plans for inventory, monitoring, and the scientific and educational use of paleontological resources, in accordance with applicable agency laws, regulations, and policies.” (123 Stat. 1172; 16 U.S.C. 470aaa).</p> <p>Every planned surface disturbing activity conducted in the planning area requires a paleontological review to be done by a professional paleontologist. The proponent of the activity must cover the cost of appropriately managing and protecting that resource (e.g. through avoidance, mitigation, curation, etc). This requirement is included as a stipulation in the NEPA document required for the project. Also, there is a survey area delineated around each surface disturbing activity, where surveys of paleontological resources are conducted, and this survey information is shared with the State of Utah. These survey areas are determined based on the potential impacts of the project during the NEPA process.</p>
	Does the RMP refer to requirements for consultation under Section 106 of the National Historic Preservation Act (NHPA) and other laws and	<p>While not referring to timeframes or to specific tribal governments, management decision CUL-13 states that BLM will “Ensure that all authorizations for land and resource use will comply with Section 106 of the National Historic Preservation Act, consistent with and subject to the goals and objectives identified at the beginning of this section for the proactive use of cultural properties in the public interest.” (Vernal RMP ROD, p. 73) While the NHPA identifies timeframes, the RMP would be stronger if</p>

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Program *Resource likely needing addressed in proposed MLP	Question	Response(s)
	directives with tribal governments, including general timeframes for completing consultation?	it identified timeframes and discussed how consultations with tribes would occur. Additionally, the RMP identifies in CUL-1 following the requirements of the Native American Graves Protection and Repatriation Act (NAGPRA) and the Archaeological Resources Protection Act (ARPA). (Vernal RMP ROD, p. 72)
	Does the RMP adequately describe or summarize the extent and type of significant archaeological resources known and assign cultural resources to the use categories specified in BLM Manuals?	Management decision CUL-20 allocates sites to one of the six applicable management categories. (Vernal RMP ROD, p. 74) The Nine Mile Canyon area is currently being allocated, and some other sites have been allocated as well. However, there are many more sites that have not been allocated. Also, the RMP identifies four areas with a “known high site density” of cultural resources. (Vernal PRMP/FEIS, p. 3-18) And the RMP identifies the types of prehistoric, ethnographic, historical, non-archaeological, and know NHRP listed sites found within the planning area. (Vernal PRMP/FEIs, p. 3-11 to 3-19)
	Does the RMP fully protect significant cultural and paleontological resources through special designations?	While Management Decision CUL-19 does require that when NHRP-eligible cultural resources are found during an inventory of the public land in the planning area, “impacts to them will be mitigated, generally through avoidance...” and that “If it is determined the cultural resources cannot be avoided; consultation with the State Historic Preservation Officer (SHPO) will be initiated...” and a program on mitigation will be developed to protect the resources, it does not include a requirement that BLM consult with Tribes when there is a potential for impacts to eligible cultural sites. (Vernal RMP ROD, p. 74)
	Do route and area travel designations in the RMP address cultural and paleontological resource needs and protection?	The Vernal Field Office has initiated the development of an implementation level Travel Management Plan, which will cover the protection of cultural and paleontological resource needs and protections with regard to travel designations. While the Vernal RMP included a “Travel Management Plan,” it identified the need for a detailed “Implementation Plan developed for the RMP after completion of the ROD” that would cover issues such as the protection of specific resources at the site-specific level since the Travel Management Plan was just identifying broad area travel management designations and could not speak to the how resources were managed at the site level, where impacts actually occur. (Vernal RMP ROD, p. 22-23)
	Does the RMP allow for the definition and management of Traditional Cultural Properties?	Yes, CUL-5 reads as follows, “Limit land-disturbing activities within selected Native American traditional cultural and religious sites for continued use by tribes. Traditional cultural sites will be selected in consultation with interested Native American tribes and communities.” (Vernal RMP ROD, p. 73)

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	Does the RMP fully address land use applications that may affect cultural and paleontological resources?	<p>In Management Decision CUL-13 BLM states that “all authorizations for land and resource use will comply with Section 106 of the National Historic Preservation Act, consistent with and subject to the goals and objectives identified at the beginning of this section for the proactive use of cultural properties in the public interest.” (Vernal RMP ROD, p. 73) Section 106 requires that any project “funded, licensed, permitted, or assisted by the Federal Government” be “reviewed for impacts to significant historic properties and that the State Historic Preservation Officer and the Advisory Council on Historic Preservation be allowed to comment” on the project. (Vernal RMP ROD, p. 192) While the magnitude of certain impacts to cultural and paleontological resources may exceed what was discussed in the RMP (especially since oil and gas development has exceeded the RDF included in the RMP) the implementation level NEPA documents have addressed those changes in impact intensity and BLM has continued to work through the Section 106 process to ensure that cultural, paleontological, and historical resources are appropriately protected.</p>
	Are the decisions in the RMP based on adequate cultural and paleontological resource data as specified in BLM Planning Guidance? Is a new Class I overview needed?	<p>Management decisions CUL-30 and 31 are too specific to the Archaic period, and should be broadened to include management of resources from each of the periods represented in the area. And yes, the RMP does need a new Class I overview given the new information BLM has received. But since the new information hasn't been sorted out in an analysis yet, it is not possible to evaluate whether the existing management decisions are adequate. The cultural resources inventory included in the RMP also needs to be updated based on new information that BLM has received.</p>
	Does the RMP include goals of identifying, preserving, and protecting significant cultural and paleo resources and ensuring that they are available for present and future use?	<p>Yes, the goals and objectives for cultural resources are:</p> <ul style="list-style-type: none"> • Preserve and protect a representative array of significant cultural resources, including but not limited to traditional cultural properties, traditional use areas, rock art, and ceremonial sites, and ensure that they are available for appropriate uses by present and future generations. • Preserve and protect cultural resources in accordance with existing laws, regulations, and Executive Orders (EO), in consultation with designated contacts from Native American tribes and the State Historic Preservation Office (SHPO) to ensure that they are available for appropriate uses by present and future generations.

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		<ul style="list-style-type: none"> ● Preserve and conserve cultural resources by conducting activities in a way that protect values and provide for the following benefits: <ul style="list-style-type: none"> ○ Conservation for future use ○ Education ○ Interpretation ○ Public use ○ Research (Vernal RMP ROD, p. 72) <p>The goals and objectives for paleontological resources are:</p> <ul style="list-style-type: none"> ● Locate, evaluate, and manage paleontological resources, and protect them where appropriate. ● Facilitate suitable scientific, educational, and recreational uses of fossils. ● Ensure that significant fossils are not inadvertently damaged, destroyed, or removed from public ownership as a result of surface disturbance or land exchanges. ● Foster public awareness and appreciation of the area's paleontological heritage. (Vernal RMP ROD, p. 103)
	Does the RMP include the stated goal of reducing threats and resolving potential conflicts by ensuring compliance with NHPA Section 106 and Paleontological Resource Protection Act?	Yes, as noted previously, management decision CUL-13 requires all land use authorizations go through the Section 106 process. (Vernal RMP ROD, p. 73) The Vernal RMP does not address compliance with the Paleontological Resource Protection Act (PRPA) as the RMP predates the PRPA.
	Are there any other existing issues or any new/emerging issues that are not adequately addressed in the RMP?	<p>There are a number of new cultural, historical, and paleontological sites identified within the planning area (including within the proposed Master Leasing Plan boundaries), including some previously unidentified unique paleontological resources and new excavations.</p> <p>Appendix D of the Vernal RMP, which identified existing National Register Sites and Districts, probably needs to be updated since it only lists National Register Sites, and</p>

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		<p>is likely missing some existing sites.</p> <p>There was one citizen proposed area near Dinosaur NM that was proposed after the RMP was completed for special protection of dinosaur artifacts, and is therefore not identified in the RMP.</p>
Fire	How well do the Fire Planning Units (FPUs) match up with FPUs of adjoining BLM districts and adjoining states?	<p>When the Vernal Field Office developed, the RMP BLM conducted “edge matching” with partners in USFS and NPS, whose lands bordered the Vernal Field Office to ensure that the FPUs matched across boundaries. The Vernal Field Office also looked at what BLM offices across the border in Colorado were doing to ensure consistency, and Vernal’s FPU boundaries remain fairly consistent with surrounding offices’, which has allowed for greater operational effectiveness in dealing with fires that cross boundaries. In the future, it will be important to continue to monitor conditions on the ground as some things have changed, for example growing cheatgrass infestations may affect fire regimes.</p>
	In cases where FPUs do not match, is there sufficient rationale to validate the FPU boundaries for the planning area?	<p>The existing FPU boundaries still have good rationale, but eventually boundary changes will have to be made as on-the-ground conditions change.</p>
	Does the RMP present any constraints or issues relative to complying with the Wildland Fire Policy? If so, please explain.	<p>No. The only issue is that the terminology has changed for what constitutes appropriate management. The RMP is now out of date regarding the new terminology, but that does not affect compliance with the Wildland Fire Policy as the substance of the policy and what is included in the RMP is largely the same, and since the Vernal Field Office follows the new policy where there is a difference between the policy and the RMP.</p>
	Does the RMP present any constraints to approving biomass utilization or stewardship projects for energy production, commercial and/or non-commercial uses (e.g.,	<p>No. One of the goals and objectives for woodlands and forest resources is to “Allow for the harvest of pinyon/juniper for fuel wood, biomass, posts, pinyon nuts, Christmas and ornamental live trees, and special forest products.” (Vernal RMP ROD, p. 147)</p>

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	public woodcutting, commercial, co-generation energy production, etc.)?	
	Does the RMP conform with current policies on Fire Management Planning for identifying fire management units (FMUs)?	Yes, management decision FIRE-2 notes that the Fire Management Plan for the Vernal planning area “identifies Fire Management Units (FMUs) that describe the mix of management activities that can be used to meet the desired future conditions and land use objectives.” (Vernal RMP ROD, p. 77) The identification of FMUs has not changed since then, but this identification still conforms with existing policy.
	Does the RMP provide objectives for appropriate use of managed natural fire?	Yes, management decision FIRE-1 states that “The BLM will attempt to restore natural fire regimes in fire dependent/adapted ecosystems primarily through the use of prescribed fire and managed wildland fire.” (Vernal RMP ROD, 77) The term “managed natural fire” is the new terminology replacing “managed wildland fire,” but the substance is the same.
	Are there any other existing issues or any new/emerging issues that are not adequately addressed in the RMP?	<p>The acreages of various vegetative types identified in management decision VEG -10 may no longer be accurate, which could be problematic since fire management goals are tied closely to maintaining the appropriate mix of vegetative types by successional stages identified in VEG-10. (Vernal RMP ROD, p.136)</p> <p>In management decision FIRE-9, there is a chart with Hazardous Fuels treatment target acreages, which may no longer be accurate and probably need to be updated. (Vernal RMP ROD, p. 79) The Vernal Field Office is doing more mechanical treatments and less prescribed fire treatments than were discussed in the RMP or identified in the table under FIRE-9. For instance, the office is not doing prescribed fires in certain sage brush types.</p> <p>The Vernal Fire Management Plan was updated in 2005 and went into effect with the approval of the Vernal ROD. It is possible that the plan may require updating.</p>
Forestlands	Does the RMP identify desired future conditions for health and distribution of forest resources (broken down by forest type)?	Yes, management decision VEG-10 includes goals for vegetation type divided into existing and desired seral stages by percent of acres of habitat. These vegetation types include forestlands (Aspen, Douglas Fir, Pinyon Juniper). (Vernal RMP ROD, p. 136)

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	<p>Does the RMP address old-growth features of the forest and woodland habitat types? Is management direction provided on how to maintain or contribute to the restoration of old growth forests?</p>	<p>Yes, one of the goals and objectives under Woodlands and Forest Resources reads as follows</p> <p>“Identify, maintain, and restore forest and woodland old-growth stands to a pre-fire suppression condition. The VFO will adopt the USFS old-growth definitions and identification standards as per the USFS document “Characteristics of Old-Growth Forests in the Intermountain Region (April 1999).” In instances where the area of application in the previous document does not apply to specific species (for example, <i>Pinus edulis</i>), use the document, “Recommended Old-Growth Definitions and Descriptions, USDA Forest Service Southwestern Region, (Sept.1992).” (Vernal RMP ROD, p. 147)</p> <p>Management Decision WDF-12 includes the following special management actions for an old-growth pinyon area in Bitter Creek.</p> <ul style="list-style-type: none"> • Establishing a research/monitoring program • Restricting wood-cutting around old-growth pinyon • NSO for old-growth pinyon (160 acres) (Vernal RMP ROD, p. 149) <p>Also, the term ‘old growth’ means trees in “late successional (or seral) stages.” VEG-10 discusses managing to achieve a certain mix of late mid and early successional types as well as forest classification types. (Vernal RMP ROD, p. 136)</p> <p>There are however potentially other old growth tree stands that have not been identified both within the planning area and in both the northern and southern portions of the proposed MLP boundary, and these areas might benefit from the type of special management attention provided to the Bitter Creek old growth forest given the overall objective to “Identify, maintain, and restore forest and woodland old-growth stands to a pre-fire suppression condition.”</p>
	<p>Does the RMP identify characteristics of healthy forest conditions for forest/woodland types?</p>	<p>One of the goals and objectives of the RMP is to “Follow national BLM Forest Health and Forest Management Standards and Guidelines to assess conditions and guide management actions for the forest and woodland resource.” (Vernal RMP ROD, p. 147) Those guidelines include characteristics of healthy forest conditions and for</p>

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		forest/woodland types. And management decision VEG-10 specifies a specific mix of desired seral stages of forest habitat within the planning boundary, and this mix represents healthy forest conditions. (Vernal RMP ROD, p. 136)
	Does the RMP identify resources available for woodland product harvest and identify sustainable harvest levels in those areas?	Yes, as noted previously one of the goals and objectives of the RMP is to “Allow for the harvest of pinyon/juniper for fuel wood, biomass, posts, pinyon nuts, Christmas and ornamental live trees, and special forest products.” (Vernal RMP ROD, p. 147) And management decision WDF-10 states that “Up to 546,152 acres of forest and woodland will have treatments or be harvested.” (Vernal RMP ROD, p. 149) And the areas open to woodcutting are identified in Maps 20a and 20b, which were included as attachments to the Vernal ROD. Management decision WDF-6 notes that “Forests and woodlands will be managed under the principles of multiple use and sustained yield without permanent impairment of the productivity of the land and the quality of the environment...” (Vernal RMP ROD, p. 149) However, the specific harvest levels that are sustainable were to be identified in the forest management plan, which hasn’t been developed yet.
	Does the RMP identify areas where commercial and/or non-commercial harvesting is open, restricted or withdrawn from commercial activities?	The Vernal RMP only identifies areas “open to woodcutting.” (Vernal RMP ROD, Map 20a and 20b) It does not identify areas that are “restricted or withdrawn from commercial activity” and it doesn’t divide areas based on whether they are open to commercial woodcutting, or just casual woodcutting.
	Does the RMP comply with the objectives outlined in the Healthy Forest Initiative and the Healthy Forests Restoration Act?	Yes, management decision WDF-7 states that “The National Healthy Forest Initiative will be implemented.” (Vernal RMP ROD, p. 149)
	Does the RMP support utilization of biomass across broad landscapes and is it consistent with policy?	Yes, as noted earlier, one of the goals and objectives of the RMP is to “Encourage utilization of woodland products, including biomass, from lands that will be converted to other resource uses and salvage of woodland products where compatible with other resource management objectives.” (Vernal RMP ROD, p. 147) However, to date, there has not been too much demand for biomass on public lands within the planning area.
	Are there any other existing issues or any	The RMP is fairly broad in its goals for forestry and those largely reflect local and national goals.

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	new/emerging issues that are not adequately addressed in the RMP?	<p>Are likely seeing impacts from climate change. Aspen is declining. Regionally we're seeing pine beetle damage in forests and that the extent of the damage may be exacerbated by climate change. That has not become a big issue in Vernal FO yet.</p> <p>In some parts of the FO there are thick stands of pinyon-juniper. Pinyon-juniper is not necessarily invasive. In the FO there are trees that are 500 to 800 years old. But now some of those older trees are in thick sections surrounded by younger trees. Forest composition is quite different than 100 years ago because of a variety of factors (grazing, fire suppression, etc).</p> <p>Also, the planning area has seen a decline in aspen stands, and while the RMP includes management directed for aspen stands to "maintain or enhance distribution, density, regeneration and sustainability, and to favor regeneration of aspen where deemed appropriate. Stands will be managed for maintenance or enhancement using a variety of methods, including harvest cutting or burning" management protection such as enclosures to protect aspen from elk, were not included. (Vernal RMP ROD, p. 148)</p>
Hazardous Materials and Wastes	Is the RMP's policy statement for managing hazardous materials and wastes up to date?	<p>There is not a hazardous materials section in the Vernal RMP.</p> <p>Hazardous materials and wastes are addressed at the site-specific or project level, such as the lease sale and other EISs, and in permits for oil and gas activities.</p> <p>Under management decision REC-15, one of the requirements is to "Monitor and control disposal of human or domestic animal waste, trash, and other pollutants to prevent serious impairment of water quality." (Vernal RMP ROD, p. 109)</p>
	Does the RMP identify an inventory of hazardous materials sites, including FUD (Formerly Used Defense) sites and outline objectives for management and disposal of known or	<p>There are no FUDS within Vernal RMP planning area. CASCHE audits capture all of the hazmat sites and the Vernal Field Offices makes sure any hazardous materials on those sites are labeled and stored properly and up to OSHA standards. Vernal Petroleum Engineering Technicians (PETs) are supposed to notify companies of any leakages that they observe while on-site so the company can address the leak immediately. Any leaks or spills are reported by the companies to the Utah Dept. of Environmental Quality and are also supposed to be reported to BLM. There are no</p>

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	potential future hazardous materials sites?	objectives for management and disposal of known or potential future hazardous materials. This has made it difficult at the site-specific level to identify the appropriate requirements for certain design elements of oil and gas projects, such as the lining necessary on storage tanks to prevent the release of hazardous materials.
	Are there any other existing issues or any new/emerging issues that are not adequately addressed in the RMP?	None
Lands and Realty	Do the RMP land tenure decisions provide for consolidating land ownership? If no, please explain.	Yes, as identified in management action LAR-8, "33,359 acres of public lands for disposal are identified on Figure 6a and Appendix "S" of the Vernal RMP. (Vernal RMP ROD, p. 87) Figure 6a is a map of the parcels identified for disposal, and Appendix S contains the legal descriptions for those parcels. Also, management actions LAR-7 elaborates on BLM's disposal options and considerations.
	Do the RMP land tenure decisions provide for a balanced land tenure adjustment program?	<p>The land tenure decisions and priorities identified in the Vernal RMP were based on a comprehensive lands perspective, but instead based on program objectives. For instance, LAR-9 identifies approximately 70,700 acres of land for acquisition to allow for access to the public lands for recreation. (Vernal RMP ROD, p. 87) However, LAR-20 offers a broad set of criteria for land tenure adjustments:</p> <ul style="list-style-type: none"> ● The changes are determined to be in the public interest. The public will benefit from land resources coming into public ownership, while at the same time accommodating the needs of local and state governments, including the needs for public purposes, community growth and the economy. ● The changes result in a gain of important manageable resources on public lands such as crucial wildlife habitat, significant cultural sites, mineral resources, water sources, listed species by habitat, or areas key to productive ecosystems. ● The changes ensure public access to lands in areas where access is needed and cannot otherwise be obtained. ● The changes will promote more effective arrangement and meet essential resource objectives through land ownership consolidation. ● The changes result in acquisition of lands that serve regional or national

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		priorities identified in applicable policy directives or legislation. (Vernal RMP ROD, p. 89)
	Are there land tenure decision constraints in providing for disposals under the Federal Land Transaction Facilitation Act, P.L. 106-248? If yes, please explain.	No. Opportunities for disposal are available as identified under management decisions LAR-7 and LAR-8. (Vernal RMP ROD, p. 87)
	Does the RMP include a Table or Map identifying Land and Mineral Ownership in the Planning Area, or something comparable, clearly identifying jurisdiction over various lands or interests in lands?	Yes, there are maps for land ownership (Vernal RMP ROD, Figures 1a and 1b). However there is not a similar map for mineral ownership. Also, while the Vernal FO maintains mineral ownership records, there is no GIS data layer currently for mineral ownership. There is a new geospatial data standard for mineral ownership and a GIS data layer was never developed according to that standard.
	Does the RMP identify areas as potentially suitable for disposal by sale, exchange, or lease? Does the RMP identify acquisition areas? Do these areas reflect current priorities for landownership adjustments? List any new priority areas not described in the RMP.	Yes, Figure 6a identifies lands considered for disposal and acquisition (Vernal RMP ROD, Figure 6a). However, the Vernal FO has not made a recent check of whether those are still a priority for disposal or acquisition. This is a relevant question since some of the SITLA exchanges may lead to a change in priorities. A lot of the priorities for acquisition were recreation based. The Vernal FO has not identified any new priority areas for disposal or acquisition.
	How are planning decisions in the RMP being applied to newly-	As identified in management decision LAR-14, newly acquired are managed the same way as the surrounding areas. (Vernal RMP ROD, p. 88) Also, several management decisions identify more specifically how some acquired lands will be managed.

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	<p>acquired lands? Is future BLM management of the lands or interests in lands addressed in the EIS for the acquisition/exchange? Does the RMP identify right-of-way corridors, avoidance areas, and exclusion areas along with any general terms and conditions that may apply?</p>	<p>Management decision LAR-24 states that “No lands acquired through land tenure adjustments will be classified or opened for agricultural entry or leasing in the RMP planning area.” (Vernal RMP ROD, p. 89)</p> <p>GRA-6 states that “Lands acquired by acquisition of properties in the Nine Mile Acquired Area will not be grazed to enhance riparian and watershed values.” (Vernal RMP ROD, p. 95) Also, any lands acquired in the Nine Mile Acquired Area would be closed to OHV travel. (Vernal RMP ROD, p. 45)</p> <p>SOLW-17 states that “Old agricultural fields will be irrigated and existing ditches and diversion structures will be restored on acquired lands in Bitter Creek and Rat Hole Drainages. New ditches and diversion structures will be constructed, as well.” (Vernal RMP ROD, p. 118)</p> <p>Yes, the RMP identifies ROW corridors, avoidance areas, and exclusion areas. Map 6a identifies the existing ROW corridors, and management decision LAR-40 states that “This Approved RMP is consistent with existing right-of-way (ROW) corridors” and LAR-41 states that: “These approved transportation/utility corridors are the preferred location for future major linear ROWs which meet” identified criteria. (Vernal RMP ROD, p. 91) Furthermore, “The Approved RMP designates 55,808 acres as exclusion areas (all within seven WSAs, which is a non-discretionary decision). In addition, 106,178 acres distributed across 15 areas of non-WSA lands with wilderness characteristics will be managed as ROW avoidance areas.” (Vernal RMP ROD, p. 28)</p> <p>However these decisions are in conflict with other decisions in the Vernal RMP. For example, there are conflicts with ROW corridors overlapping with WSR segments and ACECs. Also, a black-footed ferret reintroduction zone overlaps with a ROW corridor.</p> <p>There are corridors that go through the proposed MLP area, but not the ones that conflict with other RMP decisions. See Map 6A.</p>
	<p>Does the RMP address the policies and actions under</p>	<p>Yes, the goals and objectives of the Vernal RMP include objectives to “Meet local and national non-renewable and renewable energy and other public mineral needs” and</p>

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	Executive Order (EO) 13212 of May 18, 2001 (President's National Energy Policy) toward expediting the supply and availability of energy in your RMP area?	improve "energy distribution opportunities." (Vernal RMP ROD, p. 97)
	Does the RMP identify proposed withdrawals? If so, have the withdrawals been pursued and implemented?	Yes, it does. No, they have not been implemented yet. Management decision LAR-48 discusses proposed withdrawals. (Vernal RMP ROD, p. 92). Much of the FO is withdrawn from locatable minerals as part of the Oil Shale Withdrawal.
	Are there any other existing issues or any new/emerging issues that are not adequately addressed in the RMP?	May pursue ROWs to provide access to public lands.. The Vernal RMP provides for orderly corridor planning. However, some utility corridor decisions are in conflict with decisions affecting other resources in the Vernal RMP. For example, there are conflicts with ROW corridors overlapping with WSR segments and ACECs.
Livestock Management	Does the RMP reflect the Standards for Healthy Public Lands and Guidelines for Livestock Grazing Management? Is it clear that the "Standards" apply to all programs and resource uses, not just livestock grazing?	Yes. See Appendix F of the 2008 RMP.
	Does the RMP identify lands available or not available for livestock grazing? Have changes	Yes, the RMP identifies active, inactive, and retired allotments. Changes are needed; the RMP doesn't address the high number of custodial allotments and allotments with 50 or less AUMs. These allotments require a very large workload to manage.

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	been made, or are changes needed, in the identification of these lands since the RMP was completed? List these.	
	Are there any other existing issues or any new/emerging issues that are not adequately addressed in the RMP?	<p>An emerging issue is Tribal inholdings within allotments not identified for land exchange. The RMP should address nation to nation coordination to effectively manage ecosystem functions and core areas for the protection of riparian areas and to deal with administrative boundary issues.</p> <p>An existing issue is that season of use identified in the RMP is tied to specific shape files that don't allow the needed flexibility to address issues such as climate change and drought. The polygons don't follow watersheds or other logical lines and they make it hard for us to change the season of use defensively and could make us vulnerable to litigation. The shape files also are not readily available to the public.</p> <p>Another existing issue is that the language for Forage 22 is very subjective, and needs to be modified to be more quantitative and identify management direction for how to divvy up forage AUMs between livestock and big game.</p> <p>Another issue is that Utah State direction and law contradict with BLM policy, and the RMP doesn't address this (e.g., permitting different kinds of livestock, new state law regarding water rights). The BLM policy is in the process of updating this policy.</p>
Minerals, Oil and Gas	Are leasing restrictions and stipulations affecting energy and renewable energy development (Oil & Gas, Geothermal, Solar, Wind) appropriate to protect critical resources and special areas?	<p>The stipulations developed as part of the RMP are included in Appendix K, however there are additional leasing stipulations that have been developed subsequently that provide additional protections and are included in current leases. In addition, the RMP identifies 190,434 acres as unavailable to leasing, 86,789 acres as open only under no surface occupancy (NSO) and 890,280 acres as open subject to moderate constraints such as timing limitations and controlled surface use (CSU). (Vernal RMP ROD, p. 30). The 190,434 acres unavailable to oil and gas leasing includes the 7 WSAs in the planning area, as well as 99,498 acres of lands with wilderness characteristics, and 35,128 acres considered to be "sensitive cultural and wildlife lands" by the Ute Tribe. (Vernal RMP ROD, p. 30) The existing set of stipulations and</p>

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		lease restrictions is sufficient to protect critical resources and special areas.
	Are there additional restrictions or stipulations that are needed to protect resources? Identify the additional restrictions required.	No, additional restrictions are not necessary. The flexibility provided by the current restriction that is currently there is good, and where further protections are needed those details can be specified in further site-specific stipulations.
	Is there a Reasonable Foreseeable Development (RFD) scenario per BLM Handbook H-1624-1 for implementing fluid minerals energy-related exploration and development in the planning area? If so, is it appropriate for the level of activity occurring now and projected in the near term (3-5 years)? Has the RFD been exceeded?	Yes, however, the RFD included in the Vernal RMP has been exceeded. The RFD has been updated as a technical support document, and has been used in the analysis in any subsequent lease sale EA or EIS. This updated RFD appropriately identified the level of activity currently occurring and projected over the near term. (Greater Uinta Basin Oil and Gas Cumulative Impacts Technical Support Document, March 2012)
	Does the RMP provide direction and flexibility to accommodate renewable energy development? Are there constraints in the RMP that would affect or delay issuing Rights-of-Way for wind or solar energy development?	There is not much interest in renewable energy development within the planning area, however TransWest Express and Energy Gateway South have proposed transmission line projects tied to wind energy in Wyoming that would cross the planning area.
	Are there restrictions that should be eliminated or modified because they no	None identified at this time.

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	longer are needed/appropriate, or are there other protective mechanisms in place that supercede their use, or are there industry technological changes that make the restriction(s) unnecessary?	
	Are there RFDs outlined in the RMP for other mineral resources, such as locatable or salable? If so, is level of activity commensurate with the RFD?	<p>The Vernal RMP does not include RFDs for mineral types other than oil and gas. There is not a lot of locatable development or potential within the planning area. There are some claims for locatable minerals, and some activity, mostly in Daggett County. Most of the southern area is still covered under a locatable withdrawal.</p> <p>In the northern proposed MLP boundary there are placer gold claims filed. It would be difficult to set up a large mining operation up there. There is also sand and gravel development.</p> <p>Gilsonite is also not discussed in an RFD. There are known areas, which include 36,846 acres along 172 miles of Gilsonite veins, which are open for prospecting. Also, "additional veins located through field study or prospecting not shown on Figure 9a will also be available if such are within "open" category lands." (Vernal RMP ROD, p. 99)</p>
	Does the RMP address how the RFD scenario(s) will be kept up to date?	<p>The RMP doesn't discuss how it will be updated, but the Greater Uinta Basin Oil and Gas Cumulative Impacts Technical Support Document, March 2012, which updated the RFD, states that "It is a dynamic document which can and will be updated as significant new information becomes available." (Greater Uinta Basin Oil and Gas Cumulative Impacts Technical Support Document, March 2012, p. i)</p>
	Does the RMP describe criteria for the application of appropriate stipulations for fluid minerals, along	<p>Yes, Appendix K of the 2008 Vernal RMP discusses that for each of the identified stipulations.</p>

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	with criteria for the waiver, exception, or modification of the stipulation?	
	Does the RMP incorporate sustainable development concepts or objectives relative to post-mining uses?	<p>There are reclamation guidelines for all surface disturbing activities that occur within the planning area. Management decision MCA-4 states that all surface disturbing activities “will be closely monitored to ensure compliance with authorizations/permits, conditions of approval, or terms and conditions. Actions minimizing new surface disturbance allowed by regulations, as well as actions insuring successful reclamation, will be of paramount concern.” (Vernal RMP ROD, p. 66) Also, the RMP states that one of its goals will be to “Encourage and facilitate the development by private industry of public land mineral resources in a manner that satisfies national and local needs and provides for economical and environmentally sound exploration, extraction and reclamation practices.” (Vernal RMP ROD, p. 97) And finally, under the Special Status Species section, the RMP identifies a further goal to “Mitigate or reduce long-term habitat fragmentation through avoidance and site-specific reclamation to return areas to productive levels.” (Vernal RMP ROD, p. 128) There is Gilsonite, phosphate, and oil sands potential within the planning area. The Vernal RMP doesn’t include much discussion of sustainable development concepts.</p>
	Does the RMP ensure access to sand and gravel to support infrastructure and communities?	<p>Yes, management decision MSA-2 provides for access to sand and gravel as well as other mineral materials (Vernal RMP ROD, p. 100)</p>
	Are there any other existing issues or any new/emerging issues that are not adequately addressed in the RMP?	<p>Fracking. New policy is coming out.</p> <p>Regional approach to development.</p> <p>Winter-time ozone inversions. NO_x and LO_x issues. MIN-1 notes NO_x emissions.</p> <p>Oil Shale Tar Sands EIS came after RMP. See management decisions MIN-15 through 22 and 23 through 27 were adopted as part of a maintenance action from that EIS. A number of the oil sands/tar sands areas overlap with the proposed MLP boundaries.</p>

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		<p>Not all of the areas with sold mineral potential were carried forward in the RMP. Sand and Gravel areas weren't identified in the RMP. Not everything was mapped accurately, and so some areas were overlooked. So some issues come up.</p> <p>Map 6a would need to be updated to reflect the changes to the Oil Shale withdrawal. Maintenance action.</p>
Recreation	<p>Does the RMP identify the allowable kinds and levels of recreational use to protect or conserve other resource values in the planning area? List any limitations or restrictions on recreational activities to protect or conserve other resource values.</p>	<p>Yes, it does identify some, but it is not comprehensive. The question is whether other resources protect recreation use. There are no thresholds for OHV use, noise, space.</p>
	<p>Does the RMP identify the corresponding recreation niche to be served? Plus, does it identify allowable kinds and level of land uses to sustain recreational values? List any limitations or restrictions on land uses to sustain recreational values.</p>	<p>There are some discrepancies with ACECs. There are direct conflicts where there are uses directly next to ACECs. Pelican Lake and planned disposal pits. The McCoy Flat (open riding area with trails) ACEC and a heavy truck traffic route. WSR designations are in conflict with corridor. Kings Canyon conflict with VRM 1 and 2 designations. There are conflicts with oil pad areas that are sighted in VRM 2 and recreation areas. Second Nature camp site. Is also open to oil and gas leasing and there is no protection. That is true of a lot of the developed recreation sites; some areas have already been leased or are up for lease. There are some grandfathered leases in WSAs.</p> <p>A number of these conflicts are in the boundary of the MLP.</p>
	<p>Have the Recreation Management issues changed since the RMP was completed? If yes, how are those issues being handled?</p>	<p>Yes, things have changed. Development has continued to encroach on recreation sites, and there have been changes in recreation type. Those new types are not addressed. Before 2008 there was no commercial market for antlers. Hunting with dogs, although always a relatively minor activity, has really grown. There have been impacts to water quality in Book Cliffs and Diamond Mt. Don't have stipulations for how many guides can camp together. Didn't address the socio-economics of these</p>

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		issues.
	Are all public lands clearly designated as SRMAs, ERMAs, or public lands not designated as recreation management areas?	There are SRMAs but no ERMAs. Have not developed management plans for them.
	Does the RMP identify recreation opportunity spectrum classes? Are recreation management zones for SRMAs (wherever necessary)?	<p>No spectrum classes. Those are no longer relevant.</p> <p>Yes, in the Green River corridor, the Book Cliffs for hunting, McCoy Flat, Pariette, and Nine Mile Canyon, and White River. In most cases the ACEC and SRMA overlap.</p> <p>The fee areas are not discussed much in the RMP. Don't talk a lot about management or development of the fee program. We are developing business plans for some areas, but that is not discussed in the RMP. No future areas for fee development or areas not to do that are identified.</p>
	Does the RMP include management objectives for the specific recreation opportunities to be produced in both SRMAS and ERMAs?	Yes
	Are there significant cave resources present? If yes, are specific management goals outlined for the preservation or protection of significant cave resources?	No.
	Are there any other existing issues or any new/emerging issues that are not adequately addressed in the RMP?	<p>Fee development.</p> <p>The RMP is not clear whether the No Surface Occupancy stipulation applies to the entire trail system or just the trail head. This is one of the most important trail issues.</p>

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		<p>Don't have any language for interagency agreements when another agency impacts our resources. Hunters, bear hunters, and antler hunters. Seems like an MLP issue.</p> <p>Don't have an MOU or MOA for water resource impacts from other agencies. Might be covered on p. 106. That language may be too broad. Other offices are doing things about this. Moab FO has an agreement.</p>
Off-Highway Vehicles (OHV)	Does the RMP identify all public lands as either open, limited, or closed to OHV use?	Already addressed. See TRC-13.
	Is there a transportation plan completed for the RMP which outlines the travel prescriptions under each designation?	No
	Are the OHV designations still meeting resource objectives?	Resource by resource issue. Wildlife and plant you'd probably say no because of habitat fragmentation. But fire and hunting use want as many routes available as possible. Counties want to see all of the roads open. Environmental groups would like to see more closures.
	Do planning decisions identify wilderness study areas as either limited or closed to OHVs?	WSA's are identified as closed.
	Are there any other existing issues or any new/emerging issues that are not adequately addressed in the RMP?	<p>In BLM natural areas (areas with wilderness characteristics) trying to identify routes as "primitive routes" so that they will not be maintained. This would be addressed in the Travel Management Plan, but is not currently addressed. Map 12a shows the different designations. There is a rationale for each of the areas in the ROD that are not being managed for wilderness character.</p> <p>Antler hunting is becoming a growing commercial activity, and they are using new OHV's (snow cats) that leave giant tracks that have a big impact on the surface. This also impacts critical wildlife winter range. WY is doing a better job of addressing this issue, so would be good to apply some of their lessons learned to this RMP. The</p>

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		antlers are technically BLM property, so there is a question of how to manage them (commercial, etc.).
Vegetation	Does the RMP identify desired future conditions of vegetative resources?	<p>Yes. Veg-10 talks about classifications and desired future conditions.</p> <p>Veg -10 is irrelevant because it is based on a very rough scale (1:100,000) and so doesn't adequately address desired plant communities or uses outdated information (from 1998). We now have better satellite mapping capability but the RMP doesn't require updating data every 10 years or so. The RMP should be fluid enough to take advantage of new mapping technology.</p> <p>Riparian vegetation resources are lumped into one category when in reality there are multiple vegetation types.</p>
	Does the RMP designate priority plant species and habitats, including special status species and populations of plants recognized as significant? List any priority species and habitats.	<p>There is a special status section that discusses it. VEG-13 talks about sage brush.</p> <p>Veg-10 lists vegetative types and desired mix of seral stages.</p> <p>Special status species are discussed on pages 128-132. The RMP has been updated as a maintenance action to reflect the most current version of applicable special status species Recovery Plans. This list is also found on page 58.</p>
	Does the RMP contain strategies to conserve threatened or endangered and special status plant species, including listed species and species proposed for listing?	<p>There is a special status section that discusses it.</p> <p>The RMP hasn't been updated to capture new candidate species.</p>
	Are the RMP decisions consistent with objectives and recommended actions in recovery plans, conservation agreements, and applicable biological	<p>Conservation agreements are listed on p. 57. Look at special status species section. SSS-2. Graham's penstemon was added later. May need to update appendix that lists the COA's.</p> <p>SSS-3, but quantitative needs for habitat protection and the cumulative impacts on special status species' habitat are not addressed adequately.</p>

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	opinions for threatened and endangered species?	
	Are there any other existing issues or any new/emerging issues that are not adequately addressed in the RMP?	Greater Sage Grouse habitat does not have adequate protective measures; this is currently being addressed by a state-wide planning effort that will amend the Vernal 2008 RMP. The 2008 RMP Protest resolution regarding two proposed ACECs still remains an outstanding issue.
Comprehensive Travel and Transportation Management	Does the RMP identify all public lands as: Open, Limited, or Closed to OHV use?	Yes, Map 15-a. TRC-13 also discussed those designations and the areas closed by name.
	Are the OHV designations still meeting resource objectives?	The on-going Travel Management Plan process will address these designations.
	Are transportation plans completed for the RMP which outlines the travel prescriptions under each designation?	No, it is in development. We have begun route evaluations. But it is on hold pending a SHPO agreement on Sec. 106 consultations. If that goes on too long the existing evaluations may become obsolete, which seems like it might take longer than was originally planned. There may be too many folks involved in that process. There are lots of user groups involved in the process. The FO will be broken up into 5 areas and there will be 5 separate NEPA documents. There are cooperating agencies: county, FS, NPS, tribe, state, etc.
	Are there any other existing issues or any new/emerging issues that are not adequately addressed in the RMP?	Management decision TRC-14 is out of date. The OHV miles comes from the 2002-2003 number based on county transportation maps and may not correspond to OHV routes. The on-going Travel Management Plan process will address this issue.
Vegetation	Does the plan provide adequate direction and flexibility for the District to plan and implement vegetation treated projects under Healthy Landscapes?	Yes

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	Does the RMP identify desired future conditions of vegetative resources?	Yes
	Does the RMP designate priority plant species and habitats, including special status species and populations of plants recognized as significant? List any priority species and habitats.	Yes. See management decision Veg-10. Don't have maps that identify vegetative classifications for types in the RMP. Numbers in the VEG-10 chart may not still be current.
	Does the RMP contain strategies to conserve threatened or endangered and special status plant species, including listed species and species proposed for listing?	Yes
	Are the RMP decisions consistent with objectives and recommended actions in recovery plans, conservation agreements, and applicable biological opinions for threatened and endangered species?	Yes.
	Does the RMP provide management direction to address spread of noxious and invasive species?	VEG-6 and VEG 8 discuss this. Reference made to pesticide EIS.
	Is there a current inventory of noxious or invasive species for the planning	An inventory is currently being completed.

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	area?	
	Are there any other existing issues or any new/emerging issues that are not adequately addressed in the RMP?	None identified at this time.
Visual Resources	Is there an existing visual resource inventory (VRI) for the planning area?	The most current VRI for the Vernal Field Office was completed in November 2011.
	Is the VRI current or has the inventory been updated since the original VRI was completed?	There are some changes between the new and old inventories. There is a new inventory with the following link: http://www.blm.gov/style/medialib/blm/ut/natural_resources/visual_resource_mgmt.Par_42323.File.dat/Vernal_VRI1.pdf .
	Does the VRI data meet National data standards?	Yes
	Does the RMP identify visual resource management classes?	Yes
	Do the VRM management classes consider the relationships between the visual resource inventory values and resource allocations or do they reflect the VRI classes?	VRM management classes reflect both the VRI and resource allocations/land uses.
	Are the constraints imposed by the VRM classes appropriate for managing renewable energy development?	There is an exemption for VRM in utility corridors. Diamond Mountain is the only area with much wind energy interest, and that is heavy sage grouse habitat.
	Are there any other existing issues or any new/emerging issues that	Night Skies. There are some protections in proximity to Dinosaur National Monument and recreation sites and other special sites. It is described in management decision MIN-5 found on p. 98.

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	are not adequately addressed in the RMP?	There could have been more VRM BMPs in the RMP that we have no developed.
Watersheds and Water Quality	Does the RMP discuss water quality, water quantity, and current or foreseeable beneficial uses in the planning area?	<p>It does address water quality. Doesn't address water quantity. Do talk about impacts from drilling, but not about the quantity used. Does talk a little about benefits in terms of areas of protection. Water is discussed about being managed for fish, agriculture, etc.</p> <p>It discusses it, but doesn't quantify objectives. It just says we'll adhere to Utah standards without stating clearly how to do that. It doesn't identify thresholds for 303(d) areas.</p>
	Does the RMP identify State water quality standards or establish water quality objectives where State standards are nonexistent?	State Standards – Yes. It doesn't establish standards outside of the State Standards. State has come up with plans for how to bring waters back into standard. Not reflected in the RMP. The measures are also likely not reflected in the RMP. The RMP does include measures. Sedimentation from O&G activities has been a cause of non-attainment. We do get a lot of questions on water quality. We don't always have a TMDL saying what you need to do. Some areas we don't know what the source of the non-attainment is. This is typically in FS lands.
	Does the RMP identify area wide use restrictions and/or Best Management Practices to meet water quality requirements?	<p>No. It identifies general BMPs but not localities.</p> <p>Does identify BMPs, though not aware of area wide restrictions. Some onshore orders protect underground waters though. We just say we comply with state water rights.</p>
	Are there any impaired water bodies in the planning area identified on the State 303d list? Are any impaired water bodies linked to public land use?	<p>Yes, but RMP needs to better address how to address the Upper Colorado River Salinity Act.</p> <p>Of the approximately 100 streams/water bodies assessed in the Uintah Basin Management Unit (see 2011 Vernal Analysis of the Management Situation), only 9 streams/water bodies that lie within the Vernal planning area on the 303(d) list. Some of the streams/water bodies are located on FS or State lands. A primary source of impairment for streams/water bodies located on BLM managed land is from O&G development that BLM has permitted. Most streams have been monitored. But a lot of them have not been assessed and had a plan developed for how to reach attainment. There are a number of BMPs for reducing sedimentation.</p>

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	Does the RMP set objectives for the restoration of identified impaired waters?	<p>No, it doesn't say what things should be done if a stream is listed on the 303d list.</p> <p>The Red Creek ACEC it does. Talks a little about Pariette ACEC. Both in ACECs. The other ACECs are managed for other resource objectives.</p>
	As appropriate, does the RMP refer to the state's Report on Water Quality (305b)?	<p>Yes</p>
	In view of the Unified Federal Policy and other provisions of the Clean Water Act, are there opportunities or needs to identify priority watersheds, or watersheds in need of special protection?	<p>We need to identify priority watersheds.</p> <p>Red Creek and Pariette ACECs have been identified. Red Mountain ACEC may also have been identified. There may be additional opportunities and needs to identify priority watersheds. Lower Green River, Nine Mile Canyon. Those are all ACECs with water values.</p>
	Does the RMP recognize wellhead/source water protection areas and specify land-use restrictions to limit water quality degradation?	<p>There's general language on well-heads. For the Vernal MLP, there should be more specific discussion of water protection. We don't have language to protect Tar Sand Spring and surface water expressions.</p> <p>Source water protection areas are not identified in the RMP. Drinking water protection zones are also not identified in the RMP, however, we have State of Utah GIS layers to consider in our project-level analysis.</p>
	Are management decisions prescribed on a watershed level? Explain.	<p>No, the planning area was not subdivided by watershed, however, there are current efforts associated with the RIME Report.</p>
	Are there any other existing issues or any new/emerging issues that are not adequately addressed in the RMP?	<p>RMP doesn't discuss groundwater issues, monitoring of groundwater, and CWA requirements for protection of groundwater.</p> <p>There's opportunity for BLM to cooperate more with Utah and EPA to address groundwater quality and quantity and address monitoring needs.</p>

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		<p>We need to consider impacts of recurring drought and climate change and its impacts on spring expressions on public lands.</p> <p>RMP doesn't address tools available to assess climate change impacts, e.g., SnowTel and RAWS.</p> <p>RMP doesn't address a source water area in Clay Basin.</p> <p>Hydrofracking is an emerging issue, and we have to see what guidance we get from WO.</p> <p>Have not addressed hydraulic fracturing and impacts from it to water. The drilling plans do include protection for any fresh water zones. The RMP did include some discussion on underground injections, but not to the extent that it is now happening. We have authorized some water disposal ponds, but none are active yet. No precipitation modeling regarding climate change impacts. Over allocation of water has also not been addressed since it is outside of BLM's ability to make decisions. There used to be more water use for fracking, but now more of it is recycled. But we have not looked at how much of the water is being used.</p>
Soil Management	Are soil survey data described and used to assess the suitability/capability of landscapes to achieve RMP objectives?	Soils aren't described in the RMP. They are described in the EIS. They are used on a site specific level. We use NRCS surveys. Don't have surveys covering all of the parts of the FO.
	Are soil survey data used to set priorities for restoration/rehabilitation and to guide development of site-specific prescriptions?	For site specific prescriptions, yes.
	Are soil survey data used to identify erosion hazards	Yes, where appropriate as it is a site specific issue. If project is in a highly erodible area, then yes. SOLW-15 and 16 discuss it. Slope criteria from the gold book we

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	or erodible classes throughout the planning area?	adhere to. Soil crusts aren't covered in the gold book. We don't implemented SOLW-13 and 14. We know they are out there, but we aren't doing much with soil crusts. Did try to characterize soil crusts, but that has not been finalized.
	Are there any other existing issues or any new/emerging issues that are not adequately addressed in the RMP?	Hardening and widening of road services in active oil and gas fields because of all of the traffic. Don't have good road requirements for oil and gas operators or permittees. Some of this is being addressed in the travel management plan. Need to do more with erosion projects, and tracking it with disturbance. With better data could better understand erosional issues. FS has better crowning and ditching requirements. Needs to be strengthened with permittees. The critical soils and biological crusts stipulations need to be strengthened perhaps as NSOs or avoidance areas. Key to erosion and re-vegetation. Also need better reseeding requirements. Even though we say we adhere to the gold book, we are just focusing on the top 6 inches to adhere to and focus on for saving. Some of these areas you need to just focus on the top 3 inches. Could be clearer about that and develop better mitigation. Get away from flat blading. There are a lot of BMPs we talk about. There are more we could use that have been successful in other states. These issues would apply to the MLP. Be more specific about soils and flesh it out more instead of just referring to the gold book.
Riparian	Does the RMP require the use of Proper Functioning Condition surveys to assess functionality of riparian areas?	Yes. First item in goals and objectives in the RMP. P. 113. It's the main goal of riparian assessment. Riparian decisions function well in the RMP with regard to grazing.
	Are there general goals to maintain functional riparian areas at PFC and to improve the condition of areas that are functioning-at-risk or non-functional so that such areas may achieve PFC?	Yes.
	Does the RMP include objectives/management actions needed to achieve	Yes, see management decisions RIP-1, RIP-2, RIP-11, and RIP-12. Program is told to protect the riparian area. Off-site mitigation is not covered in RMP. Need to improve riparian data. Working on it. RIP-10 is probably obsolete. Is not a dynamic

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	goals described under #2 (actions might also be described under other management areas such as vegetation, soils, sensitive species, etc.)?	decision, because riparian habitat is changing. It would be great to reclassify riparian areas since the last classification was is probably incorrect. The data we have on riparian has not been updated, and since riparian is so dynamic the data has changed. The assessment did not miss anything but things have changed.
	Are measures required to collect quantitative monitoring data and additional PFC surveys to evaluate effectiveness of stated management actions?	Yes.
	Is the RMP subject to review under the new Riparian performance standard?	The RMP gives priority to riparian vegetation where surface disturbing activities are precluded within 100 meters of riparian areas. Management Decisions RIP-1 through RIP-13 provide enough guidance to address riparian issues. Like any new resource management requirement that has come after the RMP was signed, the VFO adopts and adheres to any new policy, though specific language may not be reflected specifically in the RMP management decisions.
	Are there any other existing issues or any new/emerging issues that are not adequately addressed in the RMP?	There is some question as to whether or not the RMP adequately addresses drought conditions. Criteria for restricting activities during these drought conditions are provided in the RMP. See Management Decisions MCA-3 and MCA-4.
Water Management	Does the RMP evaluate the availability of water and/or the need to develop additional water sources needed to manage wild horses and burros, wildlife, recreation, habitat and other beneficial uses allowed under state water	No, not under the new state water law. Haven't discussed how the new law affects our projects. Management decisions MCA-5 through MCA-8 cover weed management.

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	law?	
	Does the RMP evaluate the availability of water within the plan area for fire suppression or other emergency needs?	No. Likely addressed in fire management plan.
	Does the RMP contain prescriptions for and identify methods of application(s) for emergency fire rehabilitation/restoration?	Yes, they are sufficient.
	Does the RMP identify Bureau water rights policy, voluntary conformance with state water law, provisions to perfect sufficient water rights to meet land management activities?	Yes. See management decision SOLW-7.
	Are there any other existing issues or any new/emerging issues that are not adequately addressed in the RMP?	None are identified at this time.
NLCS and Other Special Management Designations	Does the plan provide for Area of Critical Environmental Concern (ACECs)?	Yes
	Does the plan outline management objectives and restrictions that would	Yes. See p. 119.

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	apply to the ACECs?	
	Do the ACECs have activity or management plans that identify objectives and management actions?	One is being developed for the Pariette ACEC. Activity plans for the other ACECs have not been developed.
	Are the R&I values appropriately managed/protected?	For the Pariette ACEC, that is questionable since we have allowed development in the past. There hasn't been much enhancement or improvement in that area. With regard to R&I values, yes. Appendix G identifies the management to protect the R&I values.
	Do planning decisions identify wilderness study areas as either limited or closed to OHV use? Do planning decisions identify "limited" OHV use within Wilderness Study Areas as limited to "designated" ways rather than to "existing" ways?	Yes. WSA's are closed to OHV travel. See management decision TRC-13.
	Are OHV allocations appropriate for areas with identified wilderness characteristics?	Some of those are being managed for those characteristics, but others are not being managed for that. Don't have any LWCs that are open. Everything is closed or limited to existing routes.
	Are wild and scenic river studies completed for the planning area which identify and evaluate river segments to determine eligibility, tentative classification, protection requirements, and	Appendix C covers the WSR segment determinations.

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	suitability?	
	For public lands along streams identified as potentially suitable for inclusion in the National Wild and Scenic Rivers System, have interim management measures been established?	Yes. Upper and Lower Green River are the eligible WSR segments. There are NSO stipulations for those segments.
	Do all special management designations have clear management objectives? If not, explain.	Yes, identified in WSR-6, WSR-7, ACEC management plans, WSA measures
	Does the planning area have overlapping special management designations and if so, are the management objectives consistent? This could include an ACEC or SRMA overlapping a WSA, or various OHV designations within a single management area.	No. The SRMA and ACEC overlaps are not always consistent. They may not be non-compatible, but they may be confusing.
	If the RMP says that activity (implementation) plans will be developed for ACEC, SRMAs, Back Country Byways, OHV use areas, WSAs, etc., have these plans been completed?	No. Only one ACEC plan has been initiated out of the 7. No SRMA plans outside of the Nine Mile Canyon out of 7. There are also back country byways (plans?). Also, no WSA plans and there was no commitment to developing one.
	Does the VFO have	No

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	designated wilderness? If so, is there a wilderness management plan completed?	
	Has the Wilderness inventory been updated since the original inventory?	No full update since the ROD. It continues to be updated. 2001 was the last complete update. The natural areas were inventoried in 2007.
	Are there management constraints applied to lands identified as possessing wilderness characteristics? Are these constraints appropriate for the wilderness characteristic values identified?	In some cases. Depends on whether the RMP is protecting them. Yes, the constraints are appropriate. No new information.
	Are there citizen-proposed wilderness areas identified in the planning area? If so, describe.	Yes. All over the entire FO. Red Rocks Wilderness e.g. The Book Cliff area is the highest concentration. Around Dinosaur National Monument there are a number of natural areas.
	Are there National Historic Trails designated on the District. If so, are there objectives and management actions identified through either the RMP or an implementation level plan, for high priority trail segments or segments eligible or listed on the NHRP?	No.

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	Are there any other existing issues or any new/emerging issues that are not adequately addressed in the RMP?	<p>Two proposed ACECs [see page RMP page 18]. One proposal is for expanding the existing Pariette ACEC to protect cactus. The other is a proposal for an ACEC to protect Graham's Penstemon.</p> <p>The Utah Friends of Paleontology has proposed a special area to be known as the John Mayers Paleontological Area. This area has a high concentration of dinosaur fossils.</p>
Wild Horse and Burro	Does the RMP identify herd areas existing at the time of passage of the Wild Free Roaming Horse and Burro Act?	Yes
	Does the RMP identify herd management areas, or that there will be none?	The RMP removed HMAs and instead refers to these as Herd Areas.
	Does the RMP identify initial land estimated herd size, including the relationship between wild horses, livestock, and wildlife populations or use levels?	Not applicable, the RMP removed HMAs.
	Does the RMP identify guidelines and criteria for adjusting herd size?	RMP established a management level for a zero population size.
	Does the RMP identify guidelines and criteria for managing wild horses (i.e., a wild horse herd management plan) to achieve a thriving ecological balance, i.e., SOP's (population	No, but aerial inventories are conducted about 2-3 years but can be done more frequently in case during periods of drought.

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	management tools/techniques, genetics, genetic variability, etc.) Another words, does it collect more than just numbers?	
	Are there any other existing issues or any new/emerging issues that are not adequately addressed in the RMP?	<p>The ability of managing a HA without horses wasn't adequately considered in the RMP. For example, in an area like the Bonanza area, horses may be removed in an effort to keep the area horse-free, but in reality the area has not been kept horse free because of its vicinity to Tribal lands with their own horse herds, and the lack of natural or artificial barriers to prevent those horses from moving into the area.</p> <p>The new Utah State water law is a challenge.</p>
Wildlife, Fish Habitat and Threatened and Endangered Species*	Does the RMP identify priority wildlife species and habitats?	<p>The Vernal RMP does identify priority wildlife species and habitats. "The Approved RMP responds to issues regarding wildlife by providing restrictions to uses in crucial wildlife habitat areas. BLM uses the State Utah Division of Wildlife Resources (UDWR) crucial habitat boundaries to apply these restrictions because UDWR is the entity with jurisdiction and expertise over wildlife in Utah. The crucial habitat identified in the Approved RMP for deer, elk, bighorn sheep and other big game species is the result of the State's combination of two previous UDWR categories of habitat – "critical" and "high value." (Vernal RMP ROD, p. 46) Furthermore, one of the goals and objectives of the RMP is to "Maintain, restore, enhance, and protect crucial habitats for all fish and wildlife species and restore degraded habitats." (Vernal RMP ROD, p. 141) There are additional management decisions that relate to special status species, as well as a goals to "enhance their habitats," restore "known and potential habitat," "mitigate or reduce long-term habitat fragmentation," and manage habitat to either conserve or recover species listed under the Endangered Species Act or preclude the need to list species not already listed. (Vernal RMP ROD, p. 128) However, the Vernal RMP does not establish a way to resolve conflicts between resource uses and habitat conservation when those two goals are at cross-purposes, and as a result habitat conservation has been a lower priority</p>
	Are there management plans or prescriptions in	For some. We stay up to date with DNR updates to habitat. We always have the most up to date habitat, but that may not be reflected in the RMP. Most of the habitat

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	place for priority habitats?	<p>changes are small. There are migratory bird areas that are not discussed in the RMP. P. 57 identifies 3 priority management plans (these are old but haven't been redone; the Pariette is in process of being updated). Need to review management plans. The Bureau seems to have gone away from habitat management plans. A lot of them are old. WIL-19 says wildlife boundaries would be updated through plan maintenance. We haven't done that plan maintenance action, though it would just require creating a new map. Figure 18-a has the mule deer and elk winter range. Plan maintenance should probably be done to update that map.</p>
	Does the RMP contain measurable objectives for desired wildlife habitat conditions for major habitat types?	<p>Talks about acres of improvement to habitat. Not too many specific objectives for habitat, especially not measureable habitat objectives. The Fire plan has more measureable objectives on habitat. WL-15 identifies a crucial range for antelope, but that is the only instance of that in the RMP.</p>
	Are the Western Association of the Fish and Wildlife Agency (WAFWA) guidelines for wildlife (sage grouse, mule deer, bighorn sheep, etc.) incorporated into the RMP?	<p>VEG-13 talks about the WAFWA guidelines specific to sage grouse habitat. We still follow the WAFWA guidelines, but we generally follow the state guidelines for specific species.</p>
	Does the RMP provide adequate policy to preserve or enhance sage grouse habitat and implement sage grouse conservation planning?	<p>Ongoing statewide plan amendment will cover that. All of the sage grouse management actions in the RMP were identified as inadequate.</p>
	Does the RMP provide adequate direction to protect migratory birds, including bald and golden eagle?	<p>Vegetation section covers some of that. See wildlife management decision WL-33, 34, 35. Also have raptor BMPs, which cover eagles. The migratory birds are treated more broadly. Refer to the bald eagle recovery plan on p. 58. Appendix A includes the raptor specific protections.</p>
	Has the RMP undergone Section 7 consultation for	<p>It did. Doing additional consultation under sage grouse, which will also cover other listed species.</p>

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	all listed species within the planning area?	
	Are RMP decisions consistent with the supporting Biological Assessments, Biological Opinions, and Recovery Plans? If not, explain.	<p>USFWS reviewed RMP. ROD was consistent at the time with the BO.</p> <p>Appendix L talks about the special status species and the conservation measures applied to those species, which came directly from the BO and consultation with USFWS.</p>
	Does the RMP contain strategies to conserve threatened or endangered and special status species, including listed species, species proposed for listing, and BLM sensitive species?	<p>Yes, found in the special status species section.</p>
	Does the RMP provide direction to manage priority wildlife, fish, T&E, rare plants, including transplant, augmentations, seasonal restrictions, guidelines, etc.?	<p>Yes. The transplant guidance has been effective. There have been issues with big horn sheep and domestic sheep. There were also some bison issues. Most of the guidance says we'll work with DWR and be part of their management plan.</p> <p>White-tailed prairie dog may have inadequate management protections. Hard with minerals to avoid the prairie dog. The pronghorn sheep only has one area identified but it exists across a wider range. We have pretty good mapping of prairie dog habitat. Black ferrets management and prairie dog management is incompatible. They are managed differently.</p> <p>Upper polygon of the proposed MLP has the white-tailed prairie dog and black-footed ferret habitat. Probably need to apply protections FO wide for them to be effective.</p> <p>Most of the big game habitat only has season of use, not disturbance cap protections.</p>
	Does the RMP provide guidance for containing the potential spread of wildlife	<p>RMP decisions WL-37 and 38 address potential spread of wildlife diseases for big horn sheep.</p>

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	diseases, such as adequate separation between domestic and wild species; or white nose syndrome?	Prairie dog are monitored and analyzed for plague to see if it has migrated, but this activity is not specified in the RMP. This project is a joint-project done in with Utah State University.
	Does the RMP contain effective strategies for no net loss threatened or endangered, special status or sensitive species?	The SSS section doesn't specify no net loss.
	Are there any other existing issues or any new/emerging issues that are not adequately addressed in the RMP?	The efforts mentioned in management decision WL-4 have never taken place. Mule deer are trending down. Wildlife Habitat Fragmentation Map 19-a probably needs to be updated. There is likely a lot more habitat fragmentation since the RMP was signed in 2008. Appendix H discussed habitat fragmentation.
Wind, Solar and Geothermal Energy	Does the RMP incorporate BLM's Wind Energy Development Policy? If not, how is wind energy being addressed?	The FO is not open to wind or solar development. There is one area identified for geothermal potential but there have been no proposals for development.
	Does the RMP incorporate the stipulations and BMPs developed through the National Wind and Geothermal PEISs?	The FO is not open to wind or solar development. There is one area identified for geothermal potential but there have been no proposals for development.
	Does the RMP incorporate the Solar Energy Development policy? How is solar energy being addressed?	The VFO is not open to wind or solar development. There is one area identified for geothermal potential but there have been no proposals for development.
	Does the RMP reference	The VFO is not open to wind or solar development. There is one area identified for

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	the DOE/BLM publication of 2002 on Assessing the Potential for Renewable Energy on public land? If not, how is renewable energy potential being addressed?	geothermal potential but there have been no proposals for development.
	Are there any other existing issues or any new/emerging issues that are not adequately addressed in the RMP?	Nothing at present.
Data Management	Is the RMP geospatial data in digital format? If not, is it in hardcopy and do you know where the spatial data is located?	<p>For each of the maps included in the Vernal RMP the Vernal Office has maintained a spatial layer with all of the data that went into making that map. This data is saved in a separate folder on the Utah BLM GIS drive.</p> <p>Some of the data layers included in the Vernal RMP are being worked on by Utah BLM, including Visual Resources Management (VRM) and Oil and Gas, and this includes conducting edge matching with other BLM offices in Utah to ensure data consistency across BLM land, however edge-matching is not being done with BLM lands in Wyoming and Colorado.</p>
	Is the RMP geospatial data incorporated into the corporate data for the State and District?	Yes, for some layers. VRM, oil and gas lease categories, wilderness characteristics and some others are all incorporated into BLM Utah's corporate datasets. Incorporating data into BLM Utah's corporate datasets is an on-going process, and may not be appropriate for all datasets, for instance the cultural data is often proprietary, so that is not part of that same process. The SHPO maintains it.
	Does the geospatial data for the RMP have metadata? If so, is this metadata up to date and maintained? If there is no metadata, explain. If there is no metadata, what steps	<p>Most of the Vernal Field Office's data has metadata, though that metadata is not always complete. The metadata is updated as the data changes.</p> <p>The Vernal RMP data should stay as is except with regard to plan maintenance actions. Plan maintenance actions are one of the triggers for updating data. For instance botanists and wildlife biologists do regular updates where they find raptor nests or where species' winter-range changes. And the Vernal Field Office always</p>

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Program *Resource likely needing addressed in proposed MLP	Question	Response(s)
	are being taken to provide metadata?	<p>uses the most current shape files that it receives from the Utah State Dept. of Fish and Game. However, overall, while the Vernal Field Office has the appropriate data, it is not always well organized or easy to find.</p> <p>If we were to do it again may have wanted to include more maps like Price did. Maybe should have an RMP map checklist.</p> <p>One issue that planning for the Greater Sage-Grouse, which has established disturbance caps within sage-grouse habitat, has exposed, is that BLM does not have quantifiable disturbance data. The Vernal Field Office through a pilot program with USGS is able to gather quantifiable disturbance data from oil and gas operators, and the office's APD's now have a requirement that the operator provide geospatial data on the construction and built infrastructure of their oil and gas wells and associated development so that BLM can measure the disturbance.</p>
Regional Mitigation	Does the VFO RMP meet the direction/intent of WO IM2013-142 (Interim Policy, Draft-Regional Mitigation Manual)	Partly. Healthy Landscapes projects within the planning area are targeted toward specific landscapes. That these landscapes are already identified would facilitate future planning for mitigation at a landscape scale, and more practically these landscapes could become "mitigation sites" in any future mitigation plan, where off-site mitigation could be targeted. One of these areas is the Pariette Wetlands, which is an oasis for waterfowl and other wildlife, providing habitat for over 100 species of wildlife. (Vernal RMP ROD, p. 3 and 36)
Socioeconomics and Environmental Justice	Does the RMP provide data on and discuss social, economic, and environmental justice issues and concerns? If yes, is that data still relevant?	The Vernal RMP does identify one community, the Ute tribe, which falls within the standard of an environmental justice community, and provides some description of the community's relative economic standing. However, the analysis doesn't discuss any other minority or low income communities within the planning area, or provide any explanation for why other communities were not considered in the analysis. And thus the Vernal RMP only includes mitigation to address issues relevant to the Ute Tribe, and those issues are limited to cultural concerns and not to other broader health or economic concerns. (Vernal PRMP/FEIS, p. 4-80 to 4-81)